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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

DANIEL D'AMBLBY; AARON WOLKIND;  
STEVE HARTLEY; RICHARD SCHWETZ;  
JOBEL BARBOSA; MATTHEW  
REIDINGER; JOHN HUGO; SEAN-  
MICHAEL DAVID SCOTT; THOMAS  
LOUDEN; ZACHARY REHL; AMANDA  
REHL; K.R., a minor, by and through her  
father ZACHARY REHL and her mother  
AMANDA REHL, MARK ANTHONY  
TUCCI,

Plaintiffs,

vs.

CHRISTIAN EXOO a/k/a ANTIFASH  
GORDON; ST. LAWRENCE UNIVERSITY;  
TRIBUNE PUBLISHING COMPANY, LLC;  
NEW YORK DAILY NEWS; VIJAYA  
GADDE; TWITTER, INC; COHEN, WEISS  
AND SIMON, LLP; NICK STRICKLAND;  
TORCH ANTIFA NETWORK; UNNAMED  
ASSOCIATES 1 – 100,

Defendants.

CIVIL ACTION NO.: 2:20-cv-12880-JMV-JSA

**SECOND AMENDED COMPLAINT**

**JURY TRIAL DEMAND**

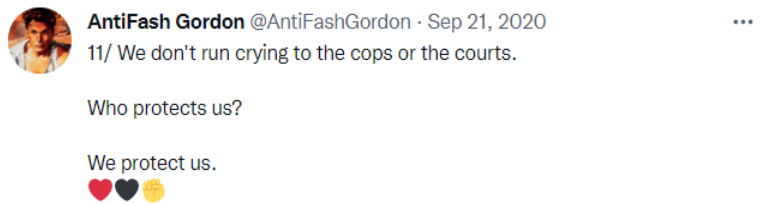
Plaintiffs, Daniel D'Ambly, Aaron Wolkind; Steven Hartley; Richard Schwetz; Jobel  
Barbosa; Matthew Reidinger; John Hugo; Sean-Michael David Scott, Jr.; Thomas Loudens;  
Zachary Rehl; Amanda Rehl; K.R., a minor, by and through her father Zachary Rehl and her  
mother Amanda Rehl (hereinafter collectively referred to as "Plaintiffs") by and through their

attorney the Law Office of Patrick Trainor, as and for their Complaint against defendants Christian Exoo a/k/a @AntifashGordon, St. Lawrence University, Tribune Publishing Company, LLC, New York Daily News, Vijaya Gadde, Twitter, Inc., Torch Antifa Network, Nick Strickland, and Cohen, Weiss, and Simon, LLP, hereby alleges as follows:

### **STATEMENT OF THE CASE**

This action arises out of the conduct of defendant Christian Exoo (hereinafter “Exoo”), under the Twitter username “@AntiFashGordon.” Defendant Exoo is a habitual doxer, who leads, associates, and conspires with likeminded associates to dox<sup>1</sup> people (“targets”) that they claim are “fascists” and “white supremacists,” in order to cause those targets to suffer employment terminations, school expulsions, and to financially devastate them. Exoo and associates coupled doxing with direct action<sup>2</sup> against Plaintiffs.

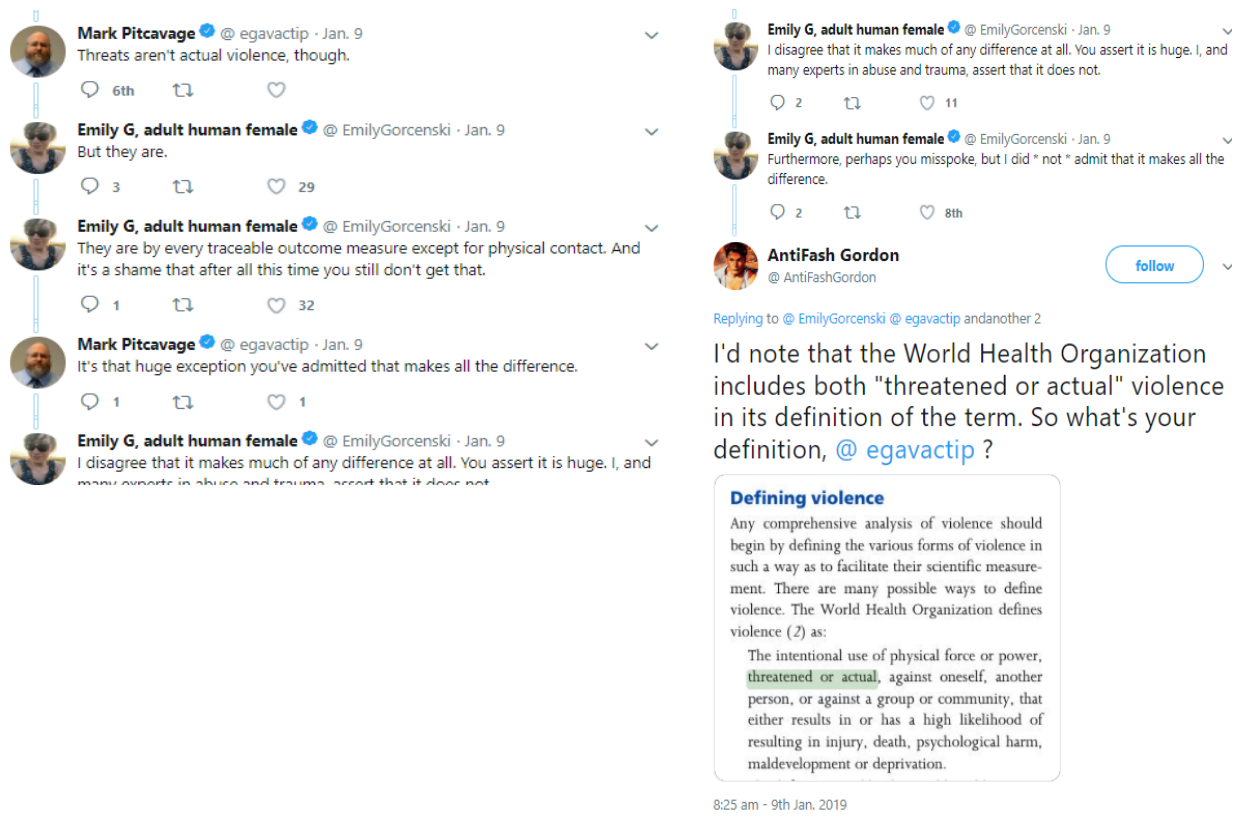
Inserted throughout this Complaint are Tweets, blog posts, and statements made by Exoo and associates with “calls to action,” mocking results of direct action, concern for legal ramifications, the promotion of the use of \*67 to mask their phone numbers. Exoo and associates believe doxes are warnings against trespass against them and all doxes and dogpiling are imbued with threats against their target. Exoo often reminds his associates “we don’t cry to the cops or the court. who protects us? we protect us.”



<sup>1</sup> *Dox Definition*, Merriam-Webster.com, <https://www.merriam-webster.com/dictionary/dox>, “to publicly identify or publish private information about (someone) especially as a form of punishment or revenge.” (last visited Nov. 14, 2021).

<sup>2</sup> *Direct Action Definition*, OxfordLearnersDictionaries.com, *The use of strikes, protests, etc. instead of discussion in order to get what you want*, <https://www.oxfordlearnersdictionaries.com/us/definition/english/direct-action?q=direct+action> (last visited Nov. 27, 2021).

Moreover, by Defendants' definition of what constitutes actual violence, doxes and their inherent threats, are actual violence. As evidenced in the images below of a Twitter conversation, involving Exoo, his key Exoo associate, Twitter user @emilygorcenski, who is a verified blue check Twitter account, and Mark Pitcavage, Senior Research Fellow, Center on Extremism, Anti-Defamation League, Exoo and @emilygorcenski dispute Mr. Pitcavage's point that threats are not actual violence, and cite to the World Health Organization definition, which includes threats as actual violence to support his position.



Exoo admits leading, associating with, and conspiring with others in an enterprise that doxes and conducts direct action against alleged fascists and white supremacists. In *Rolling Stone* magazine<sup>3</sup>, Exoo was described as the “closest thing to a leader,” and in a September

<sup>3</sup> Andy Kroll, *Meet the Undercover Anti-Fascists*, <https://www.rollingstone.com/politics/politics-features/antifa-proud-boys-militia-trump-insurrection-1121933/> (last accessed Nov. 27, 2021).

2019, Medium.com interview as “@AntiFashGordon” (or “AFG”), Exoo is described as “just about the closest thing Antifa...has to a celebrity.” In the Medium.com interview, Exoo described that<sup>4</sup>

himself is exactly what we don't need,” he explained. “I have a whole affinity group of people sharing intel with me. And I would be a lonely guy just screaming onto social media without communities to actually mobilize around this stuff.”

Exoo's associates seconded Exoo's admission that an association of people engaged in doxing and direct action exists. On or about April 9, 2021, in the blog post titled “*Antifash Gordon's Abuse, Abusers not welcome here: A statement of separation from AntiFash Gordon,*” associates announced they will no longer work with Exoo, because of his abusive behavior, which included using doxing and direct action for his own financial gain.<sup>5</sup>

and presents himself as an exemplar of anarchistic values. The reality is that AFG is a selfish, self-interested, reckless, and harmful individual who has cynically used a movement working for a better world as a vehicle for his own financial and social gain, at the expense of others, with no indication

Another former associate recently described Exoo's @AntiFashGordon Twitter account as the public face of a “vast underground network.” Moreover, associates admitted in the *Statement of Separation* blog post that for doxing and direct action Exoo compensated them with



"security culture" against disabled, trans, poc to keep their spaces insular that were easily infiltrated.

This isn't about one person. AFG is the public face of a vast underground network whose labor he takes credit. AFG isn't just Ex\_o, it started as a Boston DSA project

10:52 PM · Nov 6, 2021 · Twitter Web App

<sup>4</sup> Aaron Gell, *Anti-Fascists Are Waging a Cyber War – And They're Winning*, Medium.com, September 9, 2019, <https://gen.medium.com/antifas-keyboard-warriors-254f62be2a95> (last accessed Nov. 27, 2021). See also Ex. A.

<sup>5</sup> *Antifash Gordon's Abuse, Abusers not welcome here: A statement of separation from AntiFash Gordon*, (Apr. 9, 2021) formerly available at <https://antifashgordon.noblogs.org> (last accessed May 12, 2021) has since been taken offline but a copy is available at <https://web.archive.org/web/20210409230402/https://antifashgordon.noblogs.org/> (last accessed Nov. 27, 2012). See also Ex. B.

cash and other valuable consideration, such as money, connections to jobs, and opportunities for media appearances with his friends in the press.<sup>6</sup>

The *Statement of Separation from AntiFash Gordon* is signed by members of Defendant Torch Antifa, who published their own statement of solidarity and separation Exoo that similarly described the existence of an organization.<sup>7</sup> Torch Antifa described Exoo as someone who holds a “position of power and influence” that enables him to serve as the “arbiter and distributor of research information, media opportunities, and financial resources to other antifascists,” but who failed to acknowledge the “collective labor” behind @AntiFashGordon Twitter account.<sup>8</sup>

The association obtains private and confidential information of their targets, who use online aliases. Publication of the dox is the first step. Once the dox is published Exoo and associates dogpile a target’s employers, co-workers, schools, acquaintances. Dogpiling is when an individual uses Twitter to incite their followers to say or do a specific thing, such as reply to another person with abusive messaging,<sup>9</sup> or as Exoo himself put it:

The next step, Gordon continued, was to “find some point of vulnerability: employer, landlord, school, church, anywhere where they would lose some kind of social status or take a hit.” Often, a single phone call alerting an employer to the presence of a white nationalist on the payroll was enough to get someone fired; other times, an online publicity campaign is launched to apply community pressure. “This is not a thing we take joy in — the personal suffering of white supremacists,” David said. “But it is a good

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<sup>6</sup> *Id.*

<sup>7</sup> *Concerning Antifash Gordon: A Torch Statement in Solidarity with the Victims of Abuse*, (Apr. 9, 2021) formerly available at <https://torchantifa.org/concerning-antifash-gordon-a-torch-statement-solidarity-with-victims-of-abuse> (last accessed May 12, 2021), however, on or about November 7, 2021, Torch’s statement in the above link was taken down and it now links to a statement explaining that Torch removed the original statement in solidarity, because they received a “Cease and Desist” notice from Christian Exoo’s attorneys. (last accessed Nov. 27, 2021). A copy of both statements is attached hereto as Exhibit C.

<sup>8</sup> *Concerning Antifash Gordon: A Torch Statement in Solidarity with the Victims of Abuse*, (Apr. 9, 2021) formerly available at <https://torchantifa.org/concerning-antifash-gordon-a-torch-statement-solidarity-with-victims-of-abuse> (last accessed May 12, 2021). See also Ex. CC.

<sup>9</sup> <https://help.twitter.com/en/rules-and-policies/coordinated-harmful-activity> (last accessed Nov. 14, 2021).

### **THE PARTIES**

1. Daniel D'Ambly (hereinafter "D'Ambly"), was a twenty-seven (27) year member of Local One-L, Graphic Communications Conference of the International Brotherhood of Teamsters, who was employed as a plate maker for the New York Daily News in Jersey City, New Jersey until January 18, 2019. D'Ambly was doxed by Exoo on October 29, 2018. In the dox D'Ambly was labeled a 'fascist' and/or a 'white supremacist.' D'Ambly is a member of the New Jersey European Heritage Association ("EHA"), a non-violent, pro-domestic policy organization that the Exoo and associates have labeled a white supremacist hate group, which D'Ambly leads. D'Ambly and the EHA, actively participate in political rallies, peaceful political protests, pamphleteering, and speech that is protected by U.S. Const. amend. I and N.J. Const. art. I, ¶ 6. D'Ambly is an individual domiciled in the State of New Jersey and a "person" as defined under 18 U.S.C. § 1961(3).

2. Zachary Rehl ("Rehl") was employed by New York Life Insurance Company in Philadelphia when he was doxed by Exoo in or about August 2017, and labeled a fascist and white supremacist. Rehl is an individual domiciled in the Commonwealth of Pennsylvania and a "person" as defined under 18 U.S.C. § 1961(3).

3. Amanda Rehl ("AmRehl") is the spouse of Zachary Rehl. AmRehl is an individual domiciled in the Commonwealth of Pennsylvania and a "person" as defined under 18 U.S.C. § 1961(3).

4. K.R. ("K.R."), is the minor child of Zachary Rehl and Amanda Rehl. K.R. is an individual domiciled in the Commonwealth of Pennsylvania and a "person" as defined under 18 U.S.C. § 1961(3).

5. Aaron Wolkind (“Wolkind”) was a Technical Support Specialist for Aerzen USA Corporation (“Aerzen”) when he was doxed by Exoo on or about June 2019, and labeled a fascist, white supremacist, and a neo-Nazi. Wolkind is an individual domiciled in the State of Delaware and a “person” as defined under 18 U.S.C. § 1961(3).

6. Steven Hartley (“Hartley”), is a logistics manager for American Expediting located in Folcroft, Pa. On November 29, 2018, he was doxed by Exoo and labeled a Nazi, racist and white supremacist who was a threat to women and minorities. Hartley is an individual domiciled in the Commonwealth of Pennsylvania and a “person” as defined under 18 U.S.C. § 1961(3).

7. Mark Anthony Tucci (“Tucci”) was employed at Aldo’s Pizzarama in Philadelphia when he was doxed by Exoo on December 10, 2018, and labeled a fascist, racist, and white supremacist. Tucci is an individual domiciled in the Commonwealth of Pennsylvania and a “person” as defined under 18 U.S.C. § 1961(3).

8. Richard Schwetz (“Schwetz”) was employed at Inova Payroll in Lancaster, Pa., when he was doxed by Exoo in or about June 2020, and labeled a fascist, racist, and white supremacist. Schwetz is an individual domiciled in the Commonwealth of Pennsylvania and a “person” as defined under 18 U.S.C. § 1961(3).

9. Jobel Barbosa (“Barbosa”) is Puerto Rican and a permanently disabled veteran, who was employed as a Detail Department Manager at Jaguar Land Rover Willow Grove, in Willow Grove, Pa., when he was doxed by Exoo on June 22, 2019, and labeled a fascist, racist, and white supremacist. Barbosa is an individual domiciled in the Commonwealth of Pennsylvania and a “person” as defined under 18 U.S.C. § 1961(3).

10. Matthew Reidinger (“Reidinger”) was employed in Coal Township, Pa. On November 27, 2018, he was doxed by Exoo and labeled a fascist and white supremacist. Reidinger is an individual domiciled in the Commonwealth of Pennsylvania and a “person” as defined under 18 U.S.C. § 1961(3).

11. John Hugo (“Hugo”) was employed as a dispatch manager for Green and Yellow Cab in Somerville, Massachusetts when he was doxed by Exoo on January 2, 2020, and labeled a fascist and white supremacist. Hugo is an individual domiciled in the Commonwealth of Massachusetts and a “person” as defined under 18 U.S.C. § 1961(3).

12. Sean-Michael David Scott (“Scott”) was employed in Seattle, Washington when he was doxed by Exoo on September 16, 2019, and labeled a fascist, white supremacist, and anti-Semite. Scott is an individual domiciled in the State of Florida and a “person” as defined under 18 U.S.C. § 1961(3).

13. Thomas Loudon (“Louden”) is a 30-year volunteer firefighter and the appointed Deputy Emergency Management Coordinator for Hilltown Township, Pennsylvania and was employed as the Director of Managed Care at Thomas Jefferson University Hospital in Philadelphia for twenty-three (23) years when he was doxed by Exoo on November 2, 2020. Loudon is an individual domiciled in the Commonwealth of Pennsylvania and a “person” as defined under 18 U.S.C. § 1961(3).

14. Plaintiffs Wolkind, Hartley, Schwetz, Rehl, Barbosa, and Tucci are members of the Philadelphia chapter of the Proud Boys (hereinafter “PPB” or “Proud Boys”). Plaintiff Reidinger is a member of the Harrisburg chapter of the Proud Boys (“HPB”). The Proud Boys are a diverse, multi-racial, multi-ethnic, fraternal, males-only drinking club, who consider themselves “western chauvinists.”

15. Hugo is the President of Super Happy Fun America, a right of center civil rights organization focusing on defending the American Constitution, opposing gender madness, and defeating cultural Marxism. Super Happy Fun America is best known for organizing the 2019 Boston Straight Pride Parade. Hugo was the 2018 Republican Candidate for Massachusetts' 5<sup>th</sup> Congressional District.

16. Defendant Christian Exoo ("Exoo" or "@AntiFashGordon") is a library building supervisor and lecturer at St. Lawrence University. Exoo is a self-described anti-fascist, notorious doxer, and leader of Antifa, who by doxing others has acquired a great deal of notoriety and infamy.<sup>10</sup> Exoo currently publishes Tweets under Twitter username "@AntiFashGordon." Exoo is an individual domiciled in the State of New York and a "person" as defined under 18 U.S.C. § 1961(3).

17. St. Lawrence University ("St. Lawrence" or "STL") is a private four-year university with its principal place of business located at 116 Vilas Hall, 23 Romoda Drive, Canton, New York 13617, and a "person" as defined under 18 U.S.C. § 1961(3).

18. Tribune Publishing Company ("Tribune") is a media company organized under the laws of the State of Delaware with its principal place of business located at 160 N. Stetson

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<sup>10</sup> *Anti-Fascists Are Waging A Cyber War – And They're Winning*, Medium.com (Sep. 9, 2019) <https://gen.medium.com/antifas-keyboard-warriors-254f62be2a95> (last accessed Sep. 15, 2020); *Comcast fires employee with alleged ties to Proud Boys, We the People Rally*, PhillyVoice.com (November 15, 2018) <https://www.phillyvoice.com/comcast-fires-employee-proud-boys-alt-right-philadelphia-rally/> (last accessed Sep. 15, 2020); *The Right Wing Is Trying to Make It a Crime to Oppose Fascism*, Truthout.org (Aug. 9, 2019) <https://truthout.org/articles/the-right-wing-is-trying-to-make-it-a-crime-to-oppose-fascism/> (last accessed Sep. 15, 2020); *How to Spot An Abuser, Featuring Antifash Gordon, In His Own Words: A Step By Step Guide, and Also F\*\*\* That Guy*, Medium.com (Jun. 25, 2020) [https://medium.com/@abuse\\_isnt\\_revolutionary/how-to-spot-an-abuser-featuring-antifash-gordon-in-his-own-abuser-words-7b39f4657b19](https://medium.com/@abuse_isnt_revolutionary/how-to-spot-an-abuser-featuring-antifash-gordon-in-his-own-abuser-words-7b39f4657b19) (last accessed Sep. 15, 2020).

Avenue, Chicago, Illinois 60601 that conducts its business throughout the United States and is a “person” as defined under 18 U.S.C. § 1961(3).

19. New York Daily News Company (“Daily News”) is owned by the Tribune Publishing Company (Tribune and Daily News are sometimes hereinafter referred to collectively as “Daily News”) with a place of business located at 125 Theodore Conrad Drive, Jersey City, New Jersey 07305, and 4 New York Plaza, New York, NY 10004. The Daily News is a “person” as defined under 18 U.S.C. § 1961(3). At all times relevant, the Tribune Publishing Company had the right and did exercise control over the actions of the New York Daily News.

20. Vijaya Gadde (“Gadde”) is the Head of Legal, Public Policy, and Trust and Safety Lead at Twitter, Inc. At all times relevant, Vijaya Gadde was the sole decision maker and person authorized to permanently ban Twitter users who violated Twitter’s Terms of Service and Rules. She is a “person” as defined under 18 U.S.C. § 1961(3). Gadde is believed to be domiciled in the State of California.

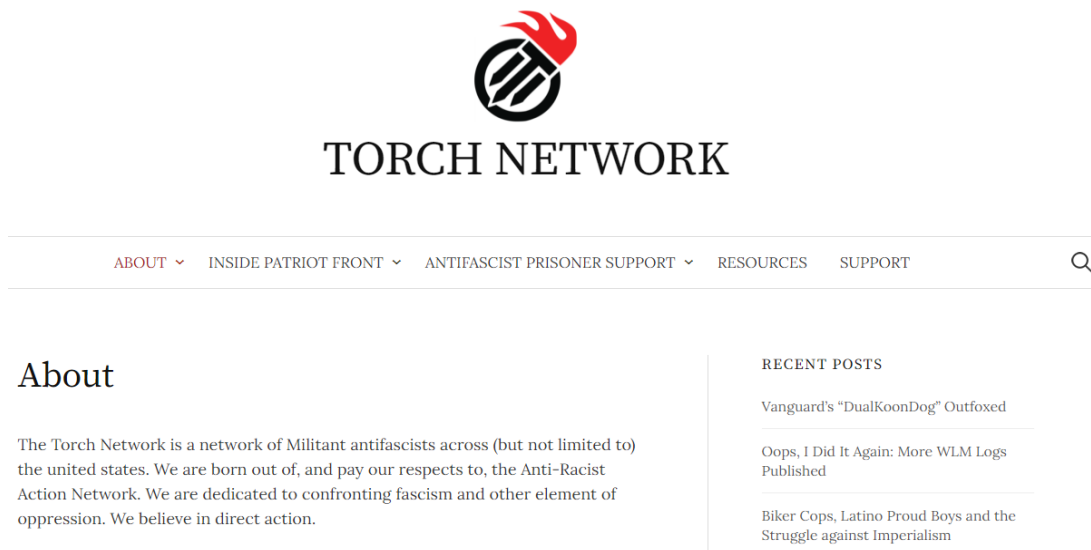
21. Twitter, Inc. (“Twitter”), is a company organized under the laws of the State of Delaware with its principal place of business located at 1355 Market Street, San Francisco, CA 94103, that conducts its business globally and a “person” as defined under 18 U.S.C. § 1961(3).

22. Exoo and associates are a criminal enterprise as defined under 18 U.S.C. § 1961(4).

23. Cohen, Weiss, and Simon, LLP (“CWS”) is a law firm with its principal place of business located at 900 3<sup>rd</sup> Avenue, #2100, New York, New York 10022 and a “person” as defined under 18 U.S.C. § 1961(3).

24. Nick Strickland is an individual domiciled in the State of New Jersey and a “person” as defined under 18 U.S.C. § 1961(3), he controls and publishes Twitter username “@NStricklanded.”

25. Torch Network a/k/a Torch Antifa Network describes itself as “*a network of Militant antifascists across (but not limited to) the United States. We are born out of, and pay our respects to, the Anti-Racist Action Network. We are dedicated to confronting fascism and other element of oppression. We believe in direct action.*”<sup>11</sup>



Torch Antifa controls and publishes Twitter account “@TorchAntifa” and internet website <https://torchantifa.org>. Torch Antifa has no known address but its internet domain [torchantifa.org](https://torchantifa.org) is registered to Pennsylvania non-profit organization One People’s Project, whose principal address is in New Brunswick, New Jersey.

### **JURISDICTION AND VENUE**

<sup>11</sup> Torch Network, <https://torchantifa.org/about/>, (last accessed Nov. 14, 2021).

26. Jurisdiction of this Court is proper because this litigation arises under federal law, namely 18 U.S.C. §§ 1961 to 1968. This Court has jurisdiction over this matter under 28 U.S.C. § 1331.

27. The Court has supplemental jurisdiction over the state law claims asserted in this case under 28 U.S.C. § 1367(a).

28. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b)(2) because a substantial part of the events or omissions giving rise to the claims occurred in this District, and the threatened and actual harm occurred in this District by reason of Defendants' conduct as alleged below.

### **FACTS PERTINENT TO ALL PLAINTIFFS**

29. Exoo and associates use the terms fascists and/or white supremacists interchangeably.

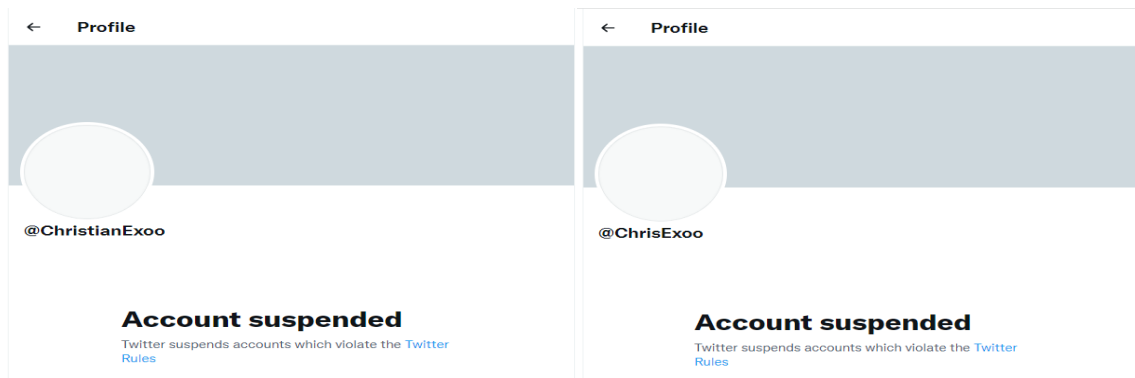
30. Defendant Exoo publishes Tweets and doxes under Twitter username “@AntiFashGordon” a leading Antifa Twitter account that as of November 14, 2021, has 53,534 Twitter followers. The headline of @AntiFashGordon's public profile as seen below states “I expose fascists via #OSINT, get them fired, de-homed, kicked out of school, etc.”



31. Doxing is prohibited by Twitter’s Private Information Policy within their Terms of Service and Rules (“TOS”).<sup>12</sup>

32. Twitter’s TOS also prohibit Coordinated harmful activity, specifically Twitter prohibits *Social Coordination*, which Twitter defines as “on or off-Twitter coordination among a group of people to amplify or propagate a specific message...an individual using Twitter to incite their followers to say or do a specific thing, such as reply to another person with abusive messaging – a practice referred to as “dogpiling.”<sup>13</sup>

33. Upon information and belief, Exoo is a habitual doxer and ban evader, who has been permanently banned at least twice before Exoo he began to publish and control @AntiFashGordon, is known to Twitter’s Trust & Safety Council (“TSC”). A ban evader is a person who creates a new Twitter account after receiving a permanent ban, which is a lifetime ban. The ban evader’s new account is called a “ban evasion account,” and is prohibited by Twitter rules.<sup>14</sup> Twitter has previously permanently banned @ChrisExoo,<sup>15</sup> @ChristianExoo.<sup>16</sup>



<sup>12</sup> <https://help.twitter.com/en/rules-and-policies/personal-information> “You may not publish or post other people’s private information without their express authorization and permission. We also prohibit threatening to expose private information or incentivizing others to do so.” (last accessed Nov. 14, 2021).

<sup>13</sup> <https://help.twitter.com/en/rules-and-policies/coordinated-harmful-activity> (last accessed Nov. 14, 2021).

<sup>14</sup> <https://help.twitter.com/en/rules-and-policies/enforcement-options> “Permanent suspension: This is our most severe enforcement action. Permanently suspending an account will remove it from global view, and the violator will not be allowed to create new accounts.” (last accessed Nov. 14, 2021).

<sup>15</sup> <https://twitter.com/ChrisExoo> (last accessed Nov. 14, 2021).

<sup>16</sup> <https://twitter.com/ChristianExoo> (last accessed Nov. 14, 2021).

34. Upon information and belief, Twitter agreed to allow Exoo, a known ban evader change his username @DoxSavage to @AntiFashGordon, in lieu of third permanent ban.



35. Exoo described his associates as “our entire crew,” and acknowledged monthly IT costs for the entire crew of about \$50.<sup>17</sup>

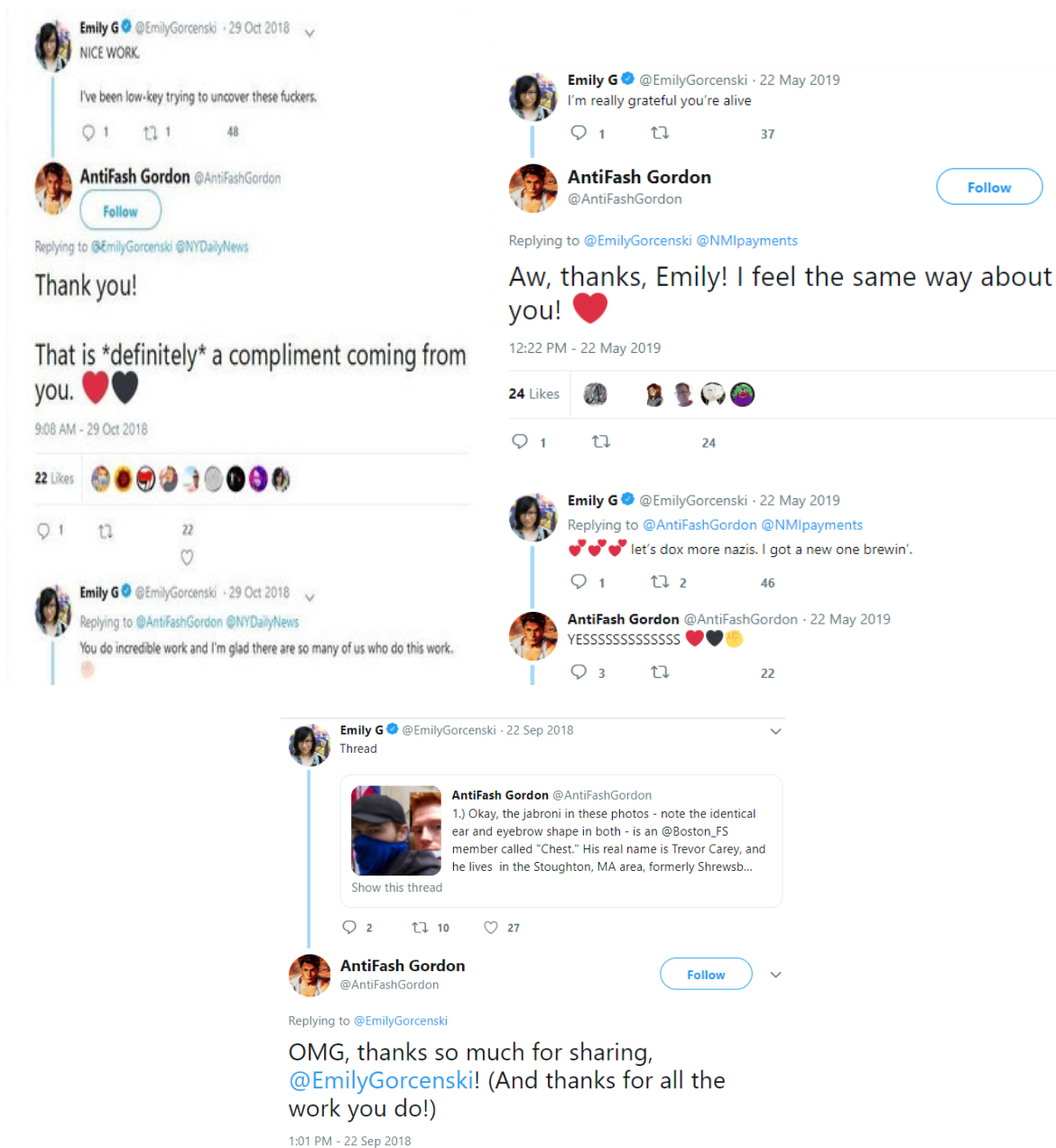
others in the movement. And he outlined the expenses. “We fight fascism on a budget,” he said. “For our entire crew — and this includes database subscriptions, VPNs, burner phones, and encrypted data storage — it comes to about \$50 a month.”

36. As seen below Exoo insists associates continue dogpiling until the target’s employer publicly announces the target’s termination.



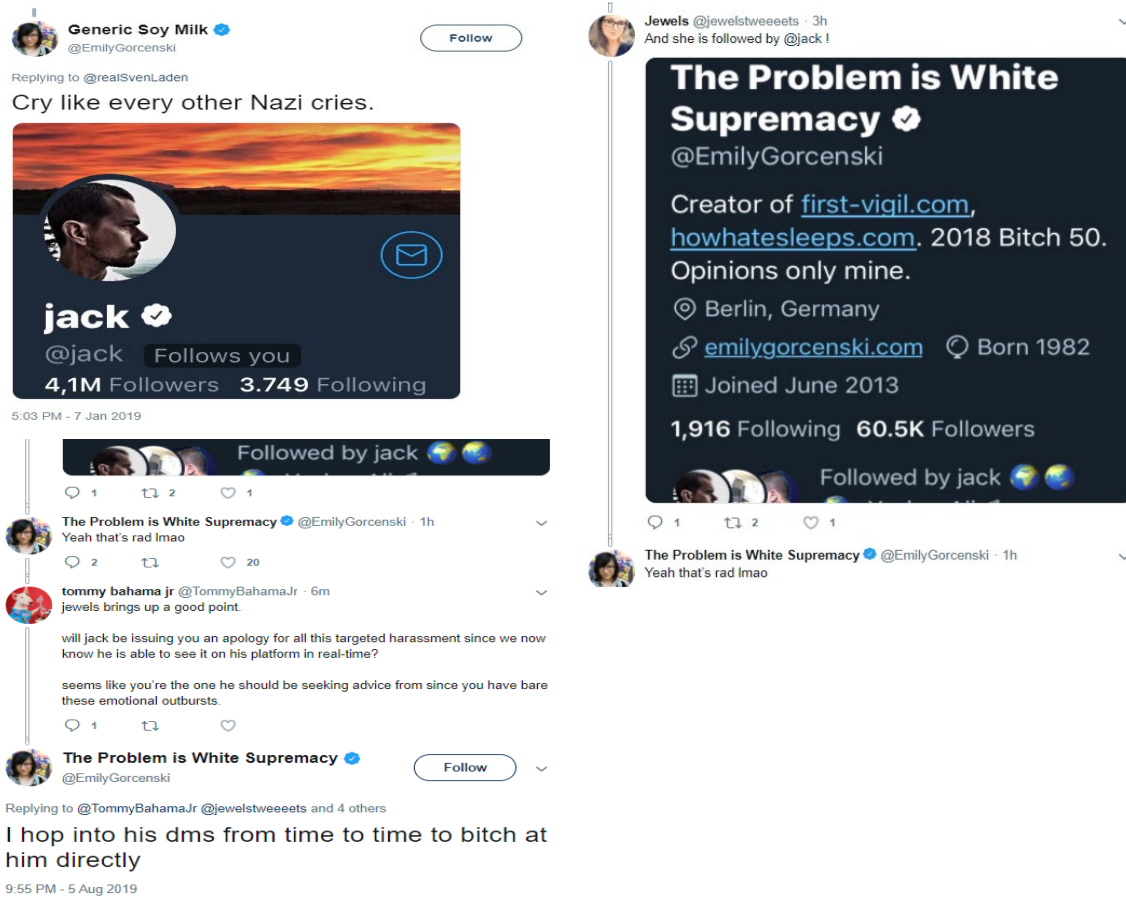
37. Exoo and associates conspire with well-known doxer who publishes Twitter account @emilygorcenski, which is a blue check Twitter verified account, who Exoo has cited as a mentor.

<sup>17</sup> Aaron Gell, *Anti-Fascists Are Waging a Cyber War – And They’re Winning*, Medium.com, September 9, 2019, <https://gen.medium.com/antifas-keyboard-warriors-254f62be2a95> (last accessed Nov. 27, 2021).



38. Verified blue check Twitter account @emilygorcenski is followed by Twitter CEO Jack Dorsey, accordingly @emilygorcenski can send private direct messages to @jack, and @jack sees @emilygorcenski's Tweets in his home timeline when he logs on to his account.<sup>18</sup>

<sup>18</sup> Following FAQ's, Twitter.com available at <https://help.twitter.com/en/using-twitter/following-faqs#:~:text=Followers%20are%20people%20who%20receive,they%20log%20in%20to%20Twitter> (last accessed Nov. 30, 2021).



39. Twitter account @emilygorcenski has exhibited sliding into @jack direct messages to get a Twitter account banned for “deadnaming” when Twitter Support did not ban the account, and also boasted about surviving @jack’s follower purge in 2019.



40. As a result of Exoo and associates conduct described herein, every doxed Plaintiff was threatened, had their families threatened, and sustained property damage.

### DANIEL D'AMBLY

41. D'Ambly repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 40 with the same force and effect as if set forth in detail herein again.

42. Upon information and belief, the Exoo Enterprise targeted D'Ambly as a fascist and white supremacist at some point in or about January 2018.

43. Upon information and belief, in and before September 2018, Twitter received and investigated complaints that Exoo's former Twitter account *@DoxSavage* was doxing and engaging in abusive behavior.

44. Upon information and belief, on or about October 1, 2018, Gadde and Twitter agreed to allow *@DoxSavage* to undergo a username change in lieu of a third permanent ban.

45. On October 11, 2018, *@DoxSavage* Tweeted a farewell announcement to his followers: "Hey folks—I just underwent a name change from *@DoxSavage* to *@AntiFashGordon*. I'll be back tomorrow to expose more violent fascists who were on the ground in Providence on 10/6."



46. Exoo's change for his evasion account *@DoxSavage* to *@AntiFashGordon* prevented him from losing approximately 15,000 *@DoxSavage* followers.

47. On October 29, 2018, at 11:49 a.m., *@AntiFashGordon* doxed D'Ambly in a massive twenty-two count Tweet thread that included D'Ambly's name, hometown, photograph, employer, occupation, employer's location, multiple telephone numbers for his employer, labor union Referendum Board he chaired, and the names of the other Referendum Board members.



**AntiFash Gordon**  
*@AntiFashGordon*

8.) And until now, no one knew who was behind it.

It's Daniel D'Ambly, of Dayton, New Jersey, a newspaper printer for *@NYDailyNews* in Jersey City.

11:49 AM · Oct 29, 2018

48. In the dox, *@AntiFashGordon* labeled D'Ambly a "Nazi" and directed associates to send harassing, intimidating, and threatening phone calls, and Tweets to the Daily News's Twitter username *@NYDailyNews*, to extort D'Ambly's termination. See Exhibit C, Exoo's First Dox of D'Ambly October 29, 2018.

49. Exoo's dox directed:

- a. In the 19<sup>th</sup> Tweet, *@AntiFashGordon* directed his associates "stay on top of this, too. If you don't hear back from *@NYDailyNews*, keep tweeting at them." Call their printing facilities in Jersey City at (201) \*\*\*-\*\*\*\* (number provided in original Tweet) and warn them about Daniel D'Ambly..."



- b. A follow up Tweet included a second telephone number for the Daily News and a subsequent Tweet included the direct telephone number to D'Ambly's print shop.



- c. Exoo associates dogpiled [@NYDailyNews](#) and [@Teamsters](#).



Walter ♦  
@pieroglgang

Hey @NYDailyNews . Do you know that one of your New Jersey printers, Daniel D'Ambly, is a neo-nazi running a hate group advocating for extermination of Jews? He could be the next #MagaShooter or #MagaBomber. You don't want that kind of attention, do you? Pozdrawiam i dziękuję 🇵🇱 🇪🇺

AntiFash Gordon @AntiFashGordon · Oct 29, 2018  
18.) I need your help, everyone.

Here's what you can do for me-- let @NYDailyNews know that one of their printers in Jersey City, Daniel D'Ambly, is the leader of a hate group. Get him fired.

Hate has no place in our communities.

[Show this thread](#)

1:29 PM · Oct 29, 2018 · Twitter Web Client



Red Teamster  
@BigWillP72

Replying to @HubCityAntifa and @Teamsters

This is fucking bullshit that scab needs to go ! It flies in the face of Teamster anti racist history.



11:01 PM · Oct 29, 2018 · Twitter for Android



AntiFash Gordon @AntiFashGordon

Follow

Replying to @ToneIWW @NYDailyNews @Teamsters

Hey, @Teamsters can you haul this white supremacist's ass to the garbage?

Hate has no place in our unions.

7:36 PM - 29 Oct 2018

- d. Upon information and belief, from October 29, 2018, to January 11, 2019, the Exoo Enterprise directed no less than one-hundred and ninety-one (191) Tweets to @DailyNews plus an unknown number of phone calls.
  - e. D'Ambly was never told of the threats or warned to take safety precautions.
50. On October 30, 2018, without warning D'Ambly of the threats, Tribune engaged Insite Risk Management ("Insite") to investigate D'Ambly. Insite submitted its "Private

Investigation Report” (“Report”) to the Tribune on December 4, 2018. The Report acknowledged @AntiFashGordon’s doxing was the impetus for the investigation. The Report included videos of D’Ambly and others using imprudent language during political rallies.

51. On or before January 8, 2019, EHA posted flyers on public bulletin boards in Princeton, New Jersey that announced an “It’s okay to be white” protest march purportedly scheduled for January 12, 2019.

52. On January 9, 2019, @AntiFashGordon re-Tweeted the “It’s okay to be white” march to his associates and doxed D’Ambly again by Tweeting, “If anyone wants their leaders name, it’s Dan D’Ambly.”

53. On January 10, 2019, @AntiFashGordon published a Tweet that referenced EHA’s purported march and directed his associates to “show up and shut down” the purported march “And please say hi to their leader, Dan D’Ambly for me.”



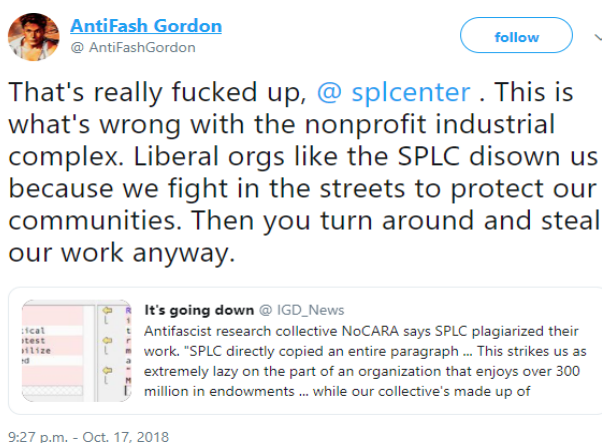
54. On January 10, 2019, D’Ambly was called to an interview with Jean Nechvatal (“Nechvatal”), Tribune’s Vice President, Talent Management & Learning and James R. Brill

(“Brill”), Daily News’s Sr. Vice President of Operations. D’Ambly was accompanied at the meeting by Union Steward Pete Cairnie. During the meeting, D’Ambly was confronted with content of the Report, but not informed of the report’s existence. D’Ambly acknowledged using imprudent language in a private conversation during a protest.

55. On January 11, 2019, at 10:14 a.m., Exoo reiterated “show up and show these pricks that we don’t tolerate hate in our streets” to stop D’Ambly’s purported march. Exoo also stated that he had not gotten official word of that D’Ambly was terminated.



56. Exoo reminded his associates to prepare for conflict, “Remember that the police won’t protect us here.”



57. The morning of January 11, 2019, after Exoo’s Tweet, Edward Bushey, Sr. Vice President, General Manager, Manufacturing and Distribution at Tribune delivered recordings of threats to the Daily News. The callers stated if they continued to employ D’Ambly the Daily

News was responsible for “any violence or blood spilled is also on your hands.” Upon information and belief, the call was received from phone number (732) 744-4937.<sup>19</sup>

----- Forwarded message -----  
 From: [REDACTED] George" <[REDACTED]@nydailynews.com>  
 To: [REDACTED] Ed" <[REDACTED]@tribpub.com>  
 Cc:  
 Bcc:  
 Date: Mon, 14 Jan 2019 19:33:44 +0000  
 Subject: FW: Voicemail from 7327444937

Ed.

This is the second message looks like the phone number is there.

George

From: Cisco Unity Connection Messaging System [mailto:[REDACTED]@relay-int.tribune.com]  
 Sent: Friday, January 11, 2019 10:21 AM  
 To: [REDACTED]@relay-int.tribune.com  
 Subject: Voicemail from 7327444937

58. On January 11, 2019, at 3:30 p.m., D’Ambly was called to a second meeting with Brill, wherein Brill issued D’Ambly a “Last and Final Warning” that stated the “*ONLY reason that you are not being terminated immediately is because, thus far, we have not determined that your activities with NJEHA has occurred at work and/or derogatory comments were made about any co-workers.*” The warning continued “should we learn that you engaged in any inappropriate speech or behavior in the workplace or with regard to any other employee, or if the Company or any of its employees suffer any backlash as a result of your association with the NJEHA, your conduct will be considered “work-related” and you will be terminated immediately.”

59. The meeting occurred five (5) hours after threats were received, but Brill did not inform or warn D’Ambly of the threats.

60. At 4:34 p.m. on January 11, 2019, @AntiFashGordon threatened D’Ambly by stating “Regardless, I’m gonna spend the next week wrecking your fucking life, Dan D’Ambly.”

---

<sup>19</sup> Electronic media copies of the threats will be submitted to the Court and all defendants on a USB thumb drive.



61. On or about the evening of January 11, 2019, D'Ambly's vehicle was "keyed" (scratched) and tires slashed while it was parked outside of his home on private property. After his vehicle was damaged, D'Ambly received a text message from unknown phone number (732) 744-4937, that stated "So your thing went well today? Did you guys get there ok?" A police report for a bias incident, criminal mischief, and harassment was filed with the South Brunswick Police Department. The phone number (732) 744-4937 is cited in South Brunswick Police Department incident report image below. *See also* Exhibit E, South Brunswick Police Department Incident Report, Case No.: I-2019-002817.

DAMBLY STATED THAT HE MAY HAVE BEEN TARGETED BY "ANTIFA" DUE TO HIS AFFILIATION WITH THE "EUROPEAN HERITAGE ASSOCIATION." HE STATED THAT A PRINCETON SCHOOL TEACHER, MARTHA FRIEND, HAD POSTED A PICTURE OF HIS VEHICLE ON TWITTER THIS PAST NOVEMBER. HE ALSO STATED THAT ANOTHER TWITTER USER, KNOWN AS "ANTIFASHGORDON", DOXXED HIM A FEW MONTHS AGO BY RELEASING HIS HOME ADDRESS, EMPLOYMENT DETAILS, PICTURES OF HIS VEHICLE, AND A SATELLITE IMAGE OF HIS HOUSE TO TWITTER. HE BELIEVES THAT THE ACTOR USED THIS INFORMATION TO FIND HIS VEHICLE AND SLASH HIS TIRES TO PREVENT HIM FROM DRIVING TO A SCHEDULED PROTEST IN PRINCETON ON SATURDAY.

HE ALSO STATED THAT HE RECEIVED A TEXT THIS WEEKEND FROM AN UNKNOWN SUBJECT (732-744-4937) ASKING HIM, "SO YOUR THING WENT WELL TODAY? DID YOU GUYS GET THERE OK?" HE BELIEVES THIS SUBJECT MAY HAVE BEEN INVOLVED WITH DAMAGING HIS TIRES.

62. Upon information and belief, on January 11, 2019, cellular phone number (732) 744-4937) described above in ¶ 63 left the message "any violence or blood spilled is also on your hands," that was captured by the New York Daily News as described in ¶ 58 above.

63. Upon information and belief, cellular phone number (732) 744-4937 belongs to the person who controls and publishes Twitter account @Nstricklanded, who sent the below message to Exoo after the message described in ¶ 58 above was captured and sent D'Ambly the text message described at ¶ 63 above.



64. On Sunday, January 13, 2019, Exoo, who had no connection to D'Ambly or Daily News, announced D'Ambly's termination to his associates twenty-four (24) hours before the Daily News claimed they learned of the threats that caused D'Ambly's termination.



65. On January 16, 2019, during a phone conference with Brill, Nechvatal, and a Union representative, D'Ambly was played the recorded death threats and asked to identify the

caller. D'Ambly was unable to identify the caller, but said it was the behavior of "Antifa types."

D'Ambly was terminated during this phone conference.

66. On January 23, 2019, Patrick LoPresti, President of Local One-L informed the Daily News that they were appealing D'Ambly's termination pursuant to terms of the Contract.

67. On or about January 25, 2019, D'Ambly received his "Termination of Employment" letter, signed by Brill, and dated January 22, 2019. The letter informed D'Ambly his termination was effective January 18, 2019. In the letter, Brill stated you "are being targeted by this group..." and "now our workplace and employees [are] at risk of counter attacks by Antifa." See Exhibit D, Termination of Employment letter dated January 22, 2019.

You are being targeted by this group  
has now put our workplace and employees at  
risk of counter attacks by Antifa.

68. The termination letter falsely stated the Daily News learned of the death threats on January 14, 2019, contrary to emails that confirm the Daily News learned of the threats on January 11, 2019.

On Monday, January 14, 2019, we learned that two threatening voice-mails had been left on a Company voice-mail box on Friday, January 11, 2019, which caused our company to have serious concern for the safety of our employees.

----- Forwarded message -----  
From: "George" <[REDACTED]@nydailynews.com>  
To: "Ed" <[REDACTED]@tribpub.com>  
Cc:  
Bcc:  
Date: Mon, 14 Jan 2019 19:33:44 +0000  
Subject: FW: Voicemail from 7327444937

Ed,

This is the second message looks like the phone number is there.

George

From: Cisco Unity Connection Messaging System [mailto:[REDACTED]@relay-int.tribune.com]  
Sent: Friday, January 11, 2019 10:21 AM  
To: [REDACTED]@relay-int.tribune.com  
Subject: Voicemail from 7327444937

69. In the termination letter, Brill claimed the death threats received on January 11, 2019, were the "cause" of D'Ambly's termination, because the death threats meant D'Ambly

“brought his activities” into the workplace, therefore, “we deem your actions to be work related and are terminating your employment for cause.”

70. At some point after January 23, 2019, the Union on behalf of D’Ambly filed a grievance with the American Arbitration Association, case number 01-19-0000-7178. The Union retained attorneys Thomas Kennedy (“Kennedy”) and Kate M. Swearengen (“Swearengen”) of Cohen, Weiss, and Simon, LLP (collectively Kennedy, Swearengen and Cohen, Weiss and Simon, LLP shall be referred to as “CWS”) to represent D’Ambly.

71. Thereafter, D’Ambly had a phone conference with Kennedy to discuss the case. D’Ambly was acquainted with Kennedy for approximately twenty years due to his Union activities. D’Ambly explained the threats he received, property damage, and that his tires were slashed. D’Ambly stated “Tom, this Antifa are terrorists...” Kennedy angrily responded, “I do not consider Antifa to be terrorists and if you are going to continue referring to them (Antifa) as terrorists we are going to end this call.” Kennedy scoffed at D’Ambly’s desire to have his employment reinstated at the Daily News.

72. At some point thereafter, D’Ambly had his first case discussion phone conference with Kate Swearengen, who assumed representation. Without prompting, Swearengen explicitly informed D’Ambly that “she doesn’t agree with his politics, and she doesn’t want to discuss them any further.” Like Kennedy, Swearengen dismissed D’Ambly’s wish to have his employment reinstated.

73. Kennedy and Swearengen’s revulsion of D’Ambly directed their representation and they failed to adequately research basic facts favorable to D’Ambly’s wish to be reinstated. CWS ignored Brill’s misrepresentation and veracity of the claimed “cause” of their client’s termination.

74. CWS failed to adequately investigate the sources of the doxing campaign. Had CWS engaged in reasonable investigation of the source of the dox they would have discovered @AntiFashGordon's January 13, 2019, announcement that D'Ambly was terminated, which was one day before the Daily News claimed they learned of the "cause" of D'Ambly's termination.

75. On or about July 15, 2019, D'Ambly executed the "Separation Agreement and Mutual General Release" negotiated by CWS that paid D'Ambly a lump sum payment in exchange the Union would withdraw the pending arbitration case with prejudice.

76. As a result of Defendants' misconduct D'Ambly has suffered substantial personal and property damage and been severely financially harmed.

**ZACHARY REHL**

77. Rehl repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 76 with the same force and effect as if set forth in detail herein again.

78. Exoo worked with Torch Antifa members to acquire Rehl's true personal identity and doxed him on or about August 2, 2017. Rehl was labeled a fascist and white supremacist, because he organized a "Back the Blue" rally to support Philadelphia police officers.

79. As in all cases, associates dogpiled Rehl's employer with calls, emails, and Tweets, and Rehl was terminated in or about September 2017.

80. On or about October 1, 2018, Rehl was doxed a second time when he organized the "We the People" rally that occurred in Philadelphia on November 17, 2018.



AntiFash Gordon  
@AntiFashGordon

...

THREAD: Far-right groups are organizing a "We the People" rally in Philadelphia for Saturday, 11/17.

81. On November 14, 2018, Exoo followed up Rehl's dox and incited his associates to disrupt the We the People rally, because "fascism is coming and only we can stop it."



82. On November 16, 2018, Exoo further incited his followers against the We the People rally, by stating "the city granted rally permits to fascists, and the cops will be there to protect them" and reminded "Who protects us? We protect us."



83. As a result of Exoo's incitement, November 17, 2018, at 12:41 a.m., the night before the rally, Torch Antifa took "direct action" against Rehl and threw a brick through the front window of Rehl's home and spray painted the word "Nazi" on his home as seen below.



84. Exoo acknowledged media reports of the brick being thrown through Rehl's window.



2:22 AM · Nov 28, 2018 · Twitter Web Client

85. The day of the We the People rally Torch Antifa attacked two Marine Reservists that Torch Antifa they participated in the rally.

CITY

## Marines Were Attacked, Robbed Near “We the People” Rally in Philly

Police say these guys maced, punched, kicked, and robbed a group of Marine Corps reservists after calling them “Nazis” and “white supremacists.”

by VICTOR FIORILLO • 11/20/2018, 2:34 p.m.



The Philadelphia Police Department is asking for the public's help to identify a group of people accused of attacking multiple Marine Corps reservists last Saturday afternoon down the street from the the “We the People” rally.

It happened around 3:20 p.m. on November 17th on the 100 block of South Front Street. According to police, the reservists were approached by a group of males and females, who called the reservists “Nazis” and “white supremacists.”

US NEWS

## Antifa Member Charged in Assault of US Marines Near 'We the People' Rally in Philly: Reports

November 28, 2018 15:51, Last Updated: November 28, 2018 16:45

By Jack Phillips

Police arrested and charged a man believed to be the leader of an Antifa group in [Philadelphia](#) after a group of U.S. Marine reservists were assaulted on Nov. 17.

CITY

## Philly Antifa Activist Tom Keenan Charged in Assault on Marines

The alleged attack occurred on November 17th near the "We the People" rally.

by VICTOR FIORILLO • 11/26/2018, 1:44 p.m.



Tom Keenan, 33, of Mount Airy, turned himself into the police department several days ago after investigators released a video that appeared to show him and two others yelling at a group following a rally in Philadelphia, Fox News [reported](#).

86. Three members of Torch Antifa were arrested and have been charged with various felonies, including aggravated assault, ethnic intimidation, and conspiracy related to the attack.

CITY

## D.C. "Antifa Leader" Is Third Man Charged in Marine Attack in Philadelphia

Joseph Alcott has been charged with aggravated assault, ethnic intimidation, and conspiracy, among other offenses.

by VICTOR FIORILLO • 1/29/2019, 9:55 a.m.



The Philadelphia District Attorney's Office has charged 37-year-old Washington, D.C., resident Joseph Alcott with aggravated assault, ethnic intimidation, and conspiracy — all felonies — among other charges. He has pleaded not guilty and is currently out on bail.

Alcott joins codefendants Tom Keenan and Thomas Massey in the case. Both Keenan and Massey were arrested at the end of November and are also out on bail awaiting trial.

### AMANDA REHL

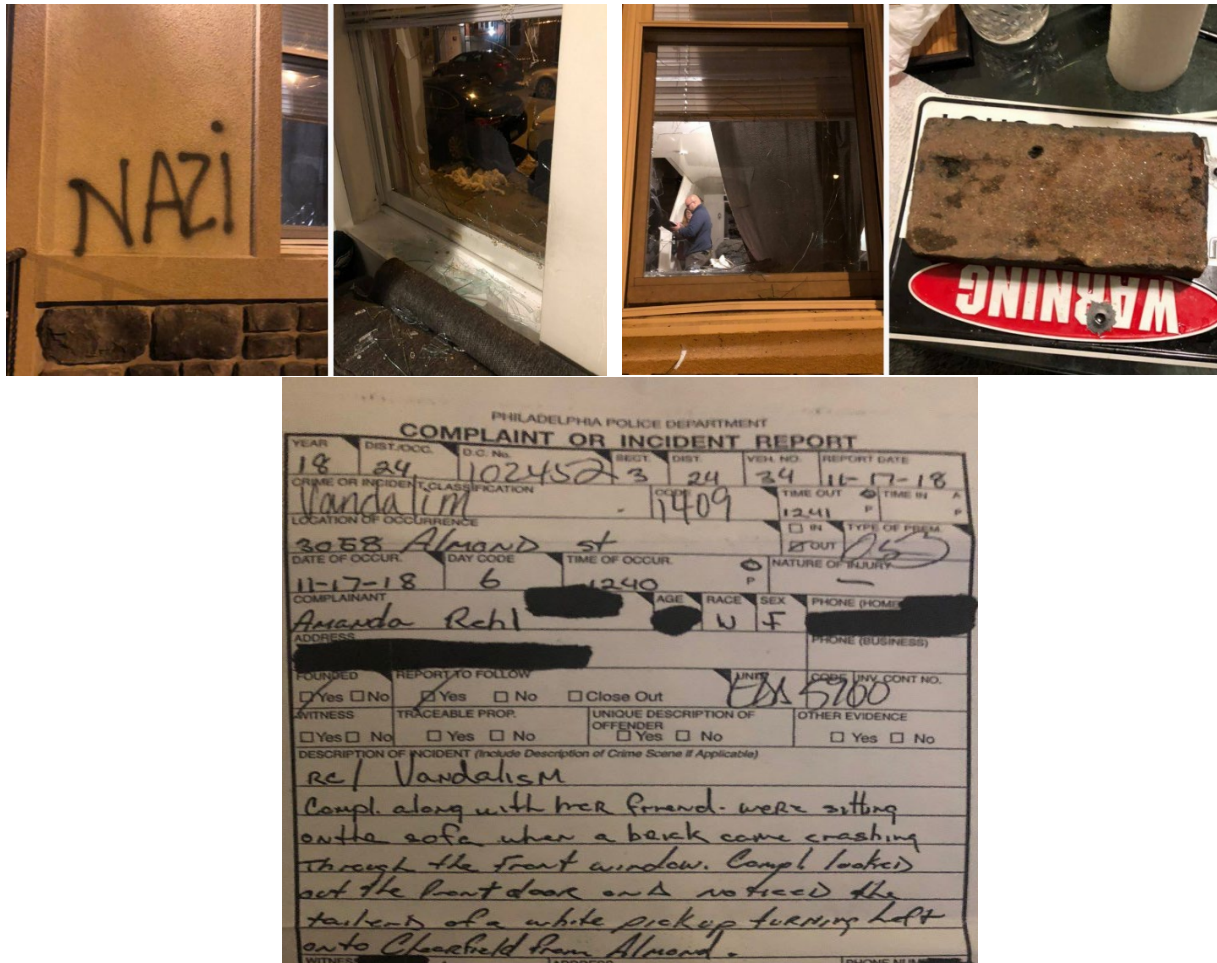
87. AmRehl repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 86 with the same force and effect as if set forth in detail herein again.

88. On or about August 2, 2017, Exoo conspired with Torch Antifa to dox AmRehl's home address when he doxed her husband, Zachary Rehl.

89. On or about October 1, 2018, AmRehl's home address was doxed a second time when Exoo doxed her husband Zachary Rehl, because he organized the "We the People" march in Philadelphia that occurred on November 17, 2018.

90. On November 14, 2018, Exoo directed his associates to counter protest and disrupt the We the People the event, because "fascism is coming and only we can stop it."

91. At 12:41 a.m. on November 17, 2018, AmRehl's safety was endangered when she was assaulted by Torch Antifs who threw a brick through the front window of AmRehl's home and spray painted the word "Nazi" on the front of her home as seen below with a copy of the Philadelphia Police Incident Report.



**K.R., a minor, by and through her father ZACHARY REHL and mother AMANDA REHL**

92. K.R. repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 92 with the same force and effect as if set forth in detail herein again.

93. On or about August 2, 2017, Exoo and Torch Antifa doxed K.R.'s home address when he doxed her father, Zachary Rehl.

94. On or about October 1, 2018, K.R.'s home address was doxed a second time when Exoo doxed K.R.'s father Zachary Rehl, because he organized the "We the People" march in Philadelphia that occurred on November 17, 2018.

95. On November 14, 2018, Exoo directed his associates to counter protest and disrupt the We the People event, because "fascism is coming and only we can stop it."

96. At 12:41 a.m. on November 17, 2018, K.R.'s safety was endangered when she was assaulted by Torch Antifa who threw a brick through the front window of her home and spray painted the word Nazi on the front of her home.



### AARON WOLKIND

97. Aaron Wolkind repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 96 with the same force and effect as if set forth in detail herein again.

98. Exoo conspired with members of Torch Antifa to obtain Wolkind's true personal identity and doxed him on or about June 21, 2019. Wolkind was called a fascist, white supremacist, and Nazi, which is an idiotic assertion, because Aaron's a Jew.



**AntiFash Gordon** @AntiFashGordon · Jun 21, 2019

Philly Proud Boy Sgt-at-arms Aaron **Wolkind** is employed as a Technical Support Specialist at @AerzenUSA, in Coatesville, PA.

...

99. On July 3, 2019, Exoo re-posted Wolkind's dox and associates dogpiled Wolkind's employer Aerzen USA ("Aerzen") social media accounts and internet profiles and dogpiled his employer and co-workers with phone calls and emails.

100. To their credit, Aerzen did not immediately terminate Wolkind, but when enterprise associates discovered Wolkind was not terminated, Exoo and associates dogpiled Aerzen's clients demanding they stop doing business Aerzen and dogpiled Aerzen's subsidiaries

101. On or about November 17, 2019, Torch Antifa became angered that a tavern in Philadelphia allegedly owned by a family member of Zach Rehl allegedly allowed Wolkind to distribute literature inside the tavern, so they encouraged dogpiling on Wolkind's employer.



102. On November 18, 2019, Exoo published Wolkind's dox and reminded associates to "Use \*67 to block your number."



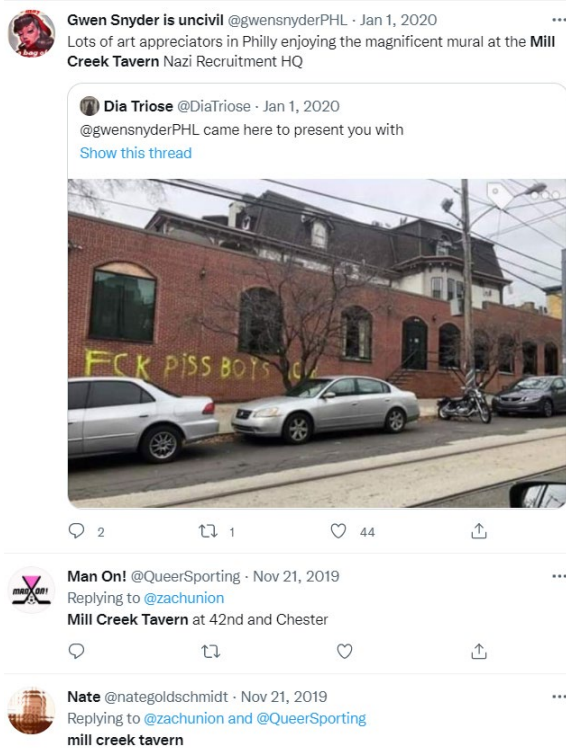
103. Torch Antifa dogpiled a tavern, because they believed Wolkind distributed literature at the tavern.



104. On or about November 19, 2018, based on Torch Antifa's belief that Wolkind was affiliated with the tavern, the tavern "got the smash," which meant its windows were broken.



105. Torch Antifa vandalized the tavern a second time on January 1, 2021, based on their belief that Wolkind was affiliated with the tavern and their damage derogatorily referenced the Proud Boys.



#### Millcreek Tavern vandalized on New Year's Day

January 3, 2020



Millcreek Tavern, located at 42nd and Chester, was sprayed with graffiti overnight on January 1, according to reports. A few windows were also broken. Owner Jack Gillespie told the [Washington Examiner](#) that the damage was estimated at approximately \$20,000.

The graffiti reads "FCK Piss Boys" and the vandalism is likely related to the backlash the restaurant received after a November incident when the management was accused allowing the Proud Boys, a right-wing group, to have a gathering at the restaurant, reportedly for recruitment purposes. The owner, however, denied that any recruitment was going on at the restaurant and also said that he believed it was members of a different group, Turning Point USA, who gathered at his restaurant, according to his post on Millcreek Tavern's [Facebook page](#).

Gillespie believes local Antifa members are responsible for the vandalism, which has occurred for the second time since the November incident.

106. As a result, Wolkind's November 18, 2019, dox and subsequent dogpiling, his employer blocked Twitter users and temporarily shut down their social media and internet profiles, and closes a Coatesville, Pa. facility for one day.



107. Wolkind continues to receive threatening and harassing phone calls due to the dox, which identifies him as a white supremacist and a Nazi, but as stated above Aaron's a Jew.

**STEVE HARTLEY**

108. Hartley repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 107 with the same force and effect as if set forth in detail herein again.



109. Hartley's employer information and home address were doxed and dogpiled on November 29, 2018, and labeled a Nazi, racist, terrorist and a threat to women and minorities.



110. Exoo partnered with Torch Antifa to dox Hartley, who dogpiled Hartley's employer and co-workers with negative posts and reviews.



111. Following his dox Torch Antifa members caused damage to Hartley's home, which is what they consider to be self-protection.

### **MARK ANTONY TUCCI**

112. Tucci repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 112 with the same force and effect as if set forth in detail herein again.

113. Exoo worked with Torch Antifa members to dox Tucci on December 10, 2018. Associates called Tucci's employer more than 600 times and shut it down.

114. In real time you can see the enterprise's conspiracy play out in their Tweets, Exoo picked up when his Torch Antifa partner got temporarily banned.



a. Enterprise associates who called Tucci's employer, Tweeted confirmation.



115. Exoo would not let his associates relent until Tucci's employer publicly announced his termination.



116. The following day Exoo directed associates to continue dogpiling.



### **RICHARD SCHWETZ**

117. Schwetz repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 116 with the same force and effect as if set forth in detail herein again.

118. The enterprise targeted Schwetz after he volunteered to clean up debris and litter at a Clean Up America event that occurred in Philadelphia on May 23, 2020.

119. Schwetz was doxed in June 2020 by an Exoo associate, but it failed to deliver as intended.



**We Will Be Ruthless** @RuthlessWe · Jun 19, 2020

...

Meet Richard **Schwetz** of Lancaster PA. Member of @splcenter designated hate group the "Proud Boys" and employee at @InovaPayroll

120. Exoo doxed Schwetz on September 21, 2020, with detailed information and a statement that we do not cry to cops or the courts.



**AntiFash Gordon** @AntiFashGordon · Sep 21, 2020

...

1/ Meet Philadelphia Proud Boy Richard Schwetz, aka "PhillyDick" aka "Dick Sweats."

He was at the Proud Boys' "rally" in West Philly on Saturday, threatening to dox protesters.

He works for @InovaPayroll in Reading, PA.

Hey, @InovaPayroll, why do you employ hate group members?



**AntiFash Gordon** @AntiFashGordon

...

8/ If you're a regular follower of mine, you know what's coming next.

We contact @InovaPayroll to get this hate group member fired.

Given their feelings about the death of George Floyd, it seems strange that @InovaPayroll employs a hate group member.

**Inova Payroll** @InovaPayroll · Jun 3, 2020

"With a heavy but hopeful heart, I stand with those calling for justice for George Floyd, and for sweeping systemic change, so that every American can live and pursue without fear or hindrance the dream that brought me to this country." A note from our CEO Farsheed Ferdowsi.

[Show this thread](#)

2:58 PM · Sep 21, 2020 · Twitter Web App



**AntiFash Gordon** @AntiFashGordon · Sep 21, 2020

...

11/ We don't run crying to the cops or the courts.

Who protects us?

We protect us.



### **MATTHEW REIDINGER**

121. Reidinger repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 120 with the same force and effect as if set forth in detail herein again.

122. Exoo and Torch Antifa conspired to dox Reidinger.

**AntiFash Gordon** @AntiFashGordon · Nov 27, 2018  
 THREAD: Let's get another Proud Boy fired.

This is Harrisburg PA Proud Boys Sergeant-at-Arms Matt Reidinger.

He came to Providence to attack protesters on 10/6.

He "still" works at the [REDACTED]

You can call them (570) [REDACTED]

**AntiFash Gordon** @AntiFashGordon · Dec 6, 2018  
 4/ Exposing Harrisburg PA Proud Boy **Matt Reidinger**?

Yup.


That was me and @GrittyIsWatchin.

123. As is the case with all victims, Exoo and associates dogpiled Reidinger's employer.

**AntiFash Gordon** @AntiFashGordon · Nov 27, 2018  
 2) We let them know last week, but all they did was shut down their Facebook page.

They had their Yelp page locked down, too.

So where do we go from here?



Unusual Activity Alert

**AntiFash Gordon** @AntiFashGordon · Nov 27, 2018  
 3) If you google the [REDACTED] you can leave a Google Review here: [google.com](https://www.google.com/reviews/submit?placeid=101714487480700000000&entry=action_review)

**AntiFash Gordon** @AntiFashGordon

UPDATE: The store Matt works at just took down their Facebook page, which is weird, since they could just leave it up and announce that they won't be employing hate group members like Matt Reidinger.

But go ahead and let them know on their Yelp page. [yelp.com](https://www.yelp.com) [REDACTED]

12:14 PM · Nov 22, 2018 · Twitter Web Client

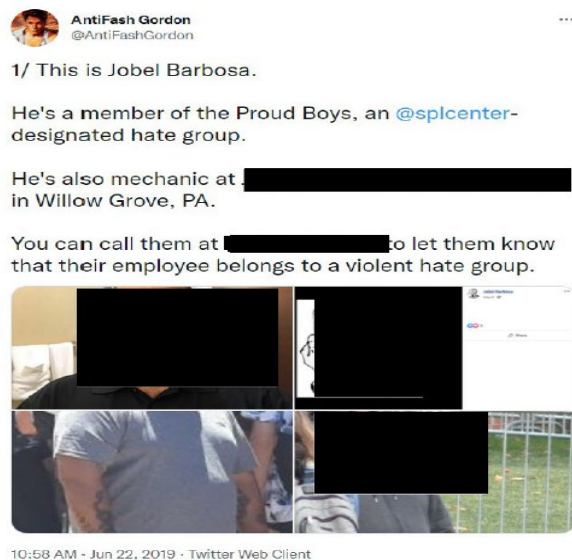
124. In his instructions Exoo instructed associates to dogpile Reidinger's employer in order to cause his termination as they successfully had done to a Comcast employee.



### **JOBEL BARBOSA**

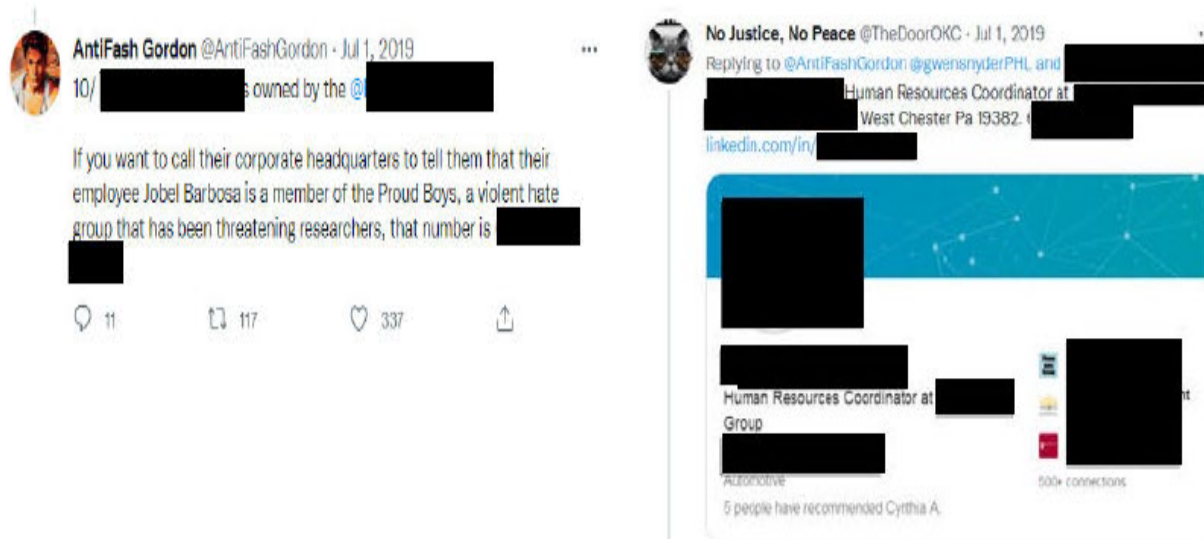
125. Barbosa repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 124 with the same force and effect as if set forth in detail herein again.

126. Exoo conspired with Torch Antifa to dox Barbosa's identity and employer's information on June 22, 2019, which dox was promoted by comedienne Kathy Griffin.

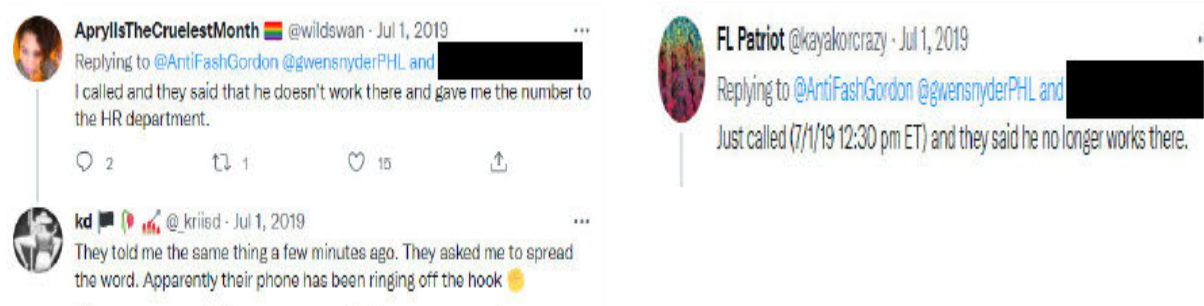


127. Barbosa is an olive-skinned Puerto Rican, who was immediately called into a meeting with a company executive and a human resource's representative and interrogated about being a white supremacist.

128. Exoo and associates did not know Barbosa was terminated on June 27, 2019, so they reposted his information on July 1, 2019, with his employer's corporate office contacts.



129. As is the custom, associates Tweeted confirmation of contacts with Barbosa's employer to Exoo.



130. Associates' confirmation to Exoo included implied violence against Barbosa.



**Twit Stalker** @StalkerofTwits · Jun 23, 2019

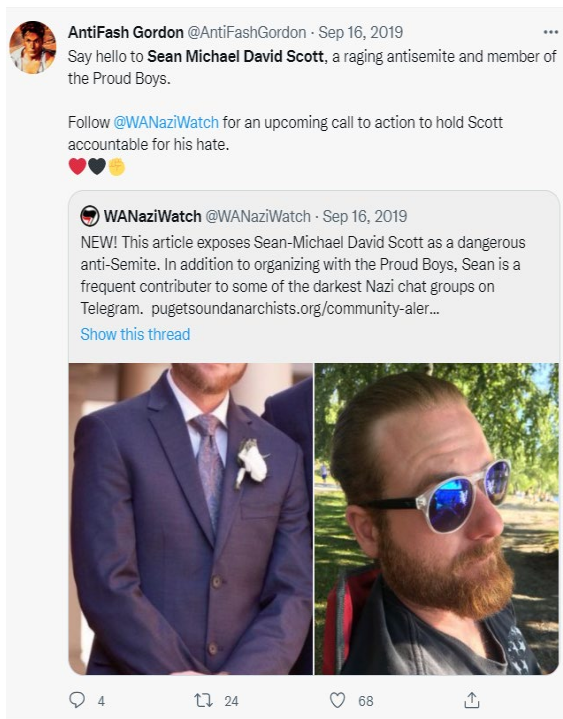
Replying to @AntiFashGordon and @splcenter

I live within three hours of Willow Grove. Consider this ass on b-b-blast !  
Every one I know thinks these jerks deserve whatever they get. ( not  
condoning or urging violence in any way )

131. Barbosa's home address and cell phone numbers for him and his wife were posted to phonezapp.noblog.org (no longer available) and Barbosa's wife received threatening calls on her personal cell phone.

### SEAN-MICHAEL DAVID SCOTT

132. Scott repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 131 with the same force and effect as if set forth in detail herein again.



134. On the same day as the dox was published, Torch Antifa posted flyers near Scott's home and caused property damage and painted it with graffiti. As a result of the property damage, Scott's property manager forced him to break his lease and immediately vacate in order to avoid further property damage that was threatened by Torch Antifa dogpilers.



135. Exoo and Torch Antifa caused Scott's termination from a second employer.



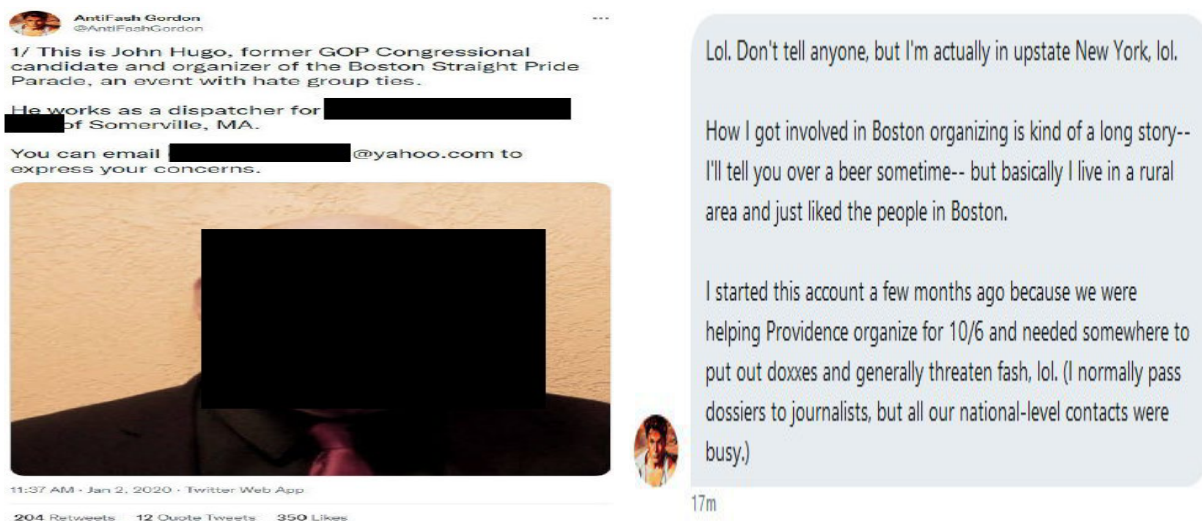
136. On or before April 15, 2020, Torch Antifa identified Scott's car and his tires were slashed, and although not seen in photo below, his passenger windows were broken. Torch Antifa mocked Scott's damaged car as seen in photos below.



### JOHN HUGO

137. Hugo repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 136 with the same force and effect as if set forth in detail herein again.

138. Hugo was doxed by Exoo on January 2, 2020, and Exoo has admitted he threatens Boston area "fash" like Hugo.



139. A second dox occurred in February 2020 that led to Hugo being terminated in March 2020.



140. Hugo continues to receive harassing phone calls from enterprise associates on a near daily basis.<sup>20</sup>

**SUPPLEMENTAL PLEADING TO ADD PLAINTIFF THOMAS LOUDEN WHO WAS INJURED BY THE ENTERPRISE AFTER THE COMPLAINT WAS FILED**

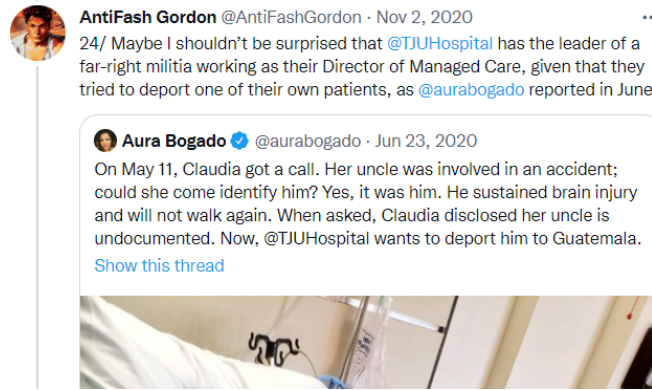
141. Louden repeats and realleges the facts pertinent to all plaintiffs as alleged above in paragraphs 1 through 140 with the same force and effect as if set forth in detail herein again.

142. The original Complaint in this action was filed on September 21, 2020, and Loudon was injured after the Complaint was filed in the same series of occurrences or transactions.

143. Louden was employed as the Director of Managed Care at Thomas Jefferson University Hospital in Philadelphia.

<sup>20</sup> Voicemail recordings are provided on thumb drive that was submitted to the Court and defendants.

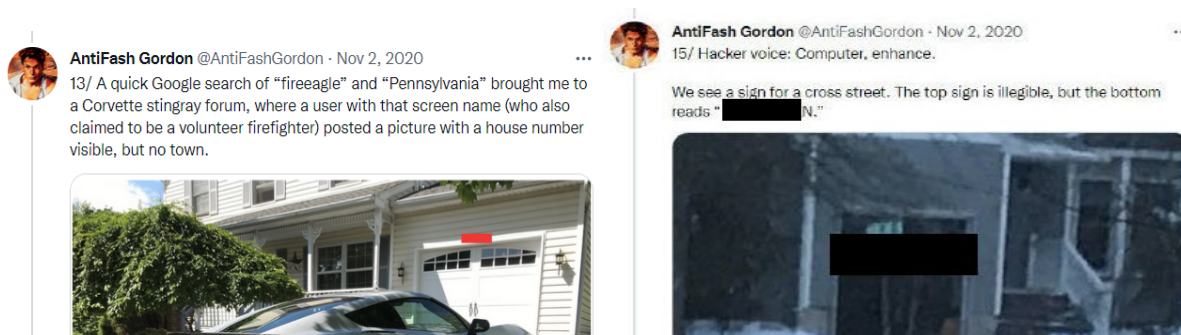
144. During a global health emergency and pandemic Exoo doxed and dogpiled Louden's hospital employer on November 2, 2020, because of the employer's decision concerning an illegal alien's immigration status.



145. Louden does not have a Twitter account was unaware of Exoo's dox until he was called to a Zoom meeting with his employer's Vice-President and a human resources representative on November 2, 2020. Louden was quizzed about his membership in a right-wing extremist group. Louden is a 30-year volunteer firefighter and the appointed Deputy Emergency Management Coordinator for Hilltown Township, Pa.

146. On November 3, 2020, Louden learned that Exoo posted photos of his home.

147. On November 10, 2020, Exoo re-posted Louden's personal information with explicit directions, including photographs of his home and local street signs, the name of the city, and longitude and latitude coordinates.



**CLAIMS FOR RELIEF**

**COUNT I**

**Violation of New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 to – 49  
(as to D’Ambly against Tribune Publishing Company and the New York Daily News)**

148. D’Ambly realleges and incorporates herein by reference each and every one of the allegations contained in paragraphs 1 through 147 with the same force and effect as if set forth in detail herein again.

149. Defendants Tribune and Daily News are employers as defined in N.J.S.A. 10:5-5.

150. D’Ambly is older than forty years (40) old and was an employee as defined in N.J.S.A. 10:5-5.

151. Defendants Tribune and Daily News discharged D’Ambly due to their enmity towards D’Ambly’s racially identifiable associations, whereas, non-white Tribune and Daily News employees who participate in racially identifiable associations, are not punished, or terminated, violated N.J.S.A. 10:5-12.

152. Defendants Tribune and Daily News undertook several pre-textual steps to mask D’Ambly’s discriminatory termination:

- a. Tribune hired a private investigation firm to invade D’Ambly’s privacy in an unsuccessful effort to catch D’Ambly engaged in unlawful activity.
- b. In the morning of January 11, 2019, the Daily News received death threats intended to extort D’Ambly’s termination that they did not immediately disclose, because they intended to use the threats pre-textually as the “cause” of D’Ambly’s termination.
- c. In the afternoon of January 11, 2019, the Daily News issued D’Ambly a “Last and Final Warning,” that warned D’Ambly he would be immediately terminated if it

were discovered he brought his political activities into the workplace, but they did not inform or warn D'Ambly of the death threats earlier received.

- d. D'Ambly was informed he was terminated on January 16, 2019.
- e. Subsequently, D'Ambly received a "Termination of Employment" letter dated January 22, 2019, whereby, the Daily News falsely stated they discovered the death threats on January 14, 2019, contrary to indisputable evidence they received the death threats on January 11, 2019, which meant he "brought his activities into the workplace" after he was warned. Daily News cited this fabrication as the "cause" of D'Ambly's termination.

153. As a direct and proximate result of defendants Tribune Publishing Company and the New York Daily News racially discriminatory termination, D'Ambly has suffered adverse consequences and continues to be damaged. D'Ambly is entitled to compensatory damages, equitable and declaratory relief, punitive damages, costs, and reasonable attorneys' fees in an amount to be determined at trial, but which is in excess of \$75,000.00.

## **COUNT II**

### **Tortious Interference with Prospective Economic Benefit (as to all Plaintiffs except K.R. against defendant Christian Exoo a/k/a "AntiFashGordon")**

154. Plaintiffs reallege and incorporate herein by reference each and every one of the allegations contained in paragraphs 1 through 153 with the same force and effect as if set forth in detail herein again.

155. Plaintiffs were rightfully entitled to pursue lawful employment.

156. Plaintiffs reasonably expected their employment to continue into the future and to benefit economically from his employment.

157. Defendant Exoo knew Plaintiffs were employed and intentionally interfered with their prospective economic benefits to be gained from continued employment.

158. Defendant Exoo intentionally and unjustifiably interfered with Plaintiffs rights to pursue lawful business.

159. Defendant Exoo's interference caused Plaintiffs' employers to terminate their employment.

160. Plaintiffs have suffered and will continue to suffer irreparable harm in the form of damage to his reputation, loss of income and financial hardship as a result of Exoo's interference.

161. As a direct and proximate result of defendant Exoo's interference with Plaintiffs prospective economic benefits, Plaintiffs have suffered adverse consequences and continue to be damaged. Plaintiffs are entitled to compensatory damages, equitable and declaratory relief, punitive damages, costs, and reasonable attorneys' fees in an amount to be determined at trial, but which is in excess of \$75,000.00.

### **COUNT III**

#### **Employer's Breach of its Duty to Warn (as to D'Ambly against defendants Tribune Publishing Company and the New York Daily News)**

162. D'Ambly realleges and incorporates herein by reference each and every one of the allegations contained in paragraphs 1 through 161 with the same force and effect as if set forth in detail herein again.

163. Defendants Tribune and Daily News received a stream of death threats directed at D'Ambly over a two and one-half month period, but they never warned D'Ambly.

164. Defendants Tribune and Daily News never warned D'Ambly to take precautionary measures as he entered or exited the workplace.

165. Defendants Tribune and Daily News did not take steps to increase the safety of D'Ambly and other employees as they entered and exited the workplace.

166. Defendants Tribune and Daily News did not secure the workplace in order to protect D'Ambly and others.

167. As he was not aware of the threats, D'Ambly could not take steps to protect himself and his property and as a result his property was damaged on January 11, 2019.

168. Defendants Tribune and Daily News had a duty to warn their employee he was the direct target of the death threats they received.

169. As a direct and proximate result of defendants Tribune and Daily News' failure to warn D'Ambly has suffered adverse consequences and continues to be damaged. D'Ambly is entitled to compensatory damages, equitable and declaratory relief, punitive damages, costs, and reasonable attorneys' fees in an amount to be determined at trial, but which is in excess of \$75,000.00.

#### **COUNT IV**

**Violations of 18 U.S.C. §§ 1962(c) – Racketeering  
Multiple violations of RICO predicates 18 U.S.C. §§ 1951 and 1952  
(as to all Plaintiffs against defendants Christian Exoo a/k/a “AntiFashGordon,” St.  
Lawrence University, Vijaya Gadde, and Twitter, Inc., the “Exoo Enterprise”)**

170. Plaintiffs reallege and incorporates herein by reference each and every one of the allegations contained in paragraphs 1 through 169 with the same force and effect as if set forth in detail herein again.

171. Each of the individuals and entities is a “person” within the meaning of 18 U.S.C. § 1961(3) who conducted the affairs of the enterprise, through a pattern of racketeering activity in violation of 18 U.S.C. § 1962(c).

172. Defendant Christian Exoo leads and conspires with associates, including Defendant Torch Antifa Network in an enterprise as defined by 18 U.S.C. 1961(4).

173. At all times relevant, Gadde was the only Twitter employee authorized to permanently ban Twitter users.<sup>21</sup>

174. Upon information and belief, Exoo’s activities are well known to his employer St. Lawrence University, who have not taken steps to prevent their employee from harming others from his place of employment, because their share his goals.

We are witnessing a resurgence of the most dangerous and hateful legacy of our nation’s history—white nationalism. The Southern Poverty Law Center, New York State, and

because of the diversity our students, staff, and faculty bring to the table. White nationalism seeks to erode this through a discourse of fear, hatred, and xenophobia. It seeks to create a concept of America that is built on white supremacy and the dis-mantling of the work of social justice and equality that have been the hall-mark of this country for the last forty years. We will stand up for the rights of our students, faculty, and staff.

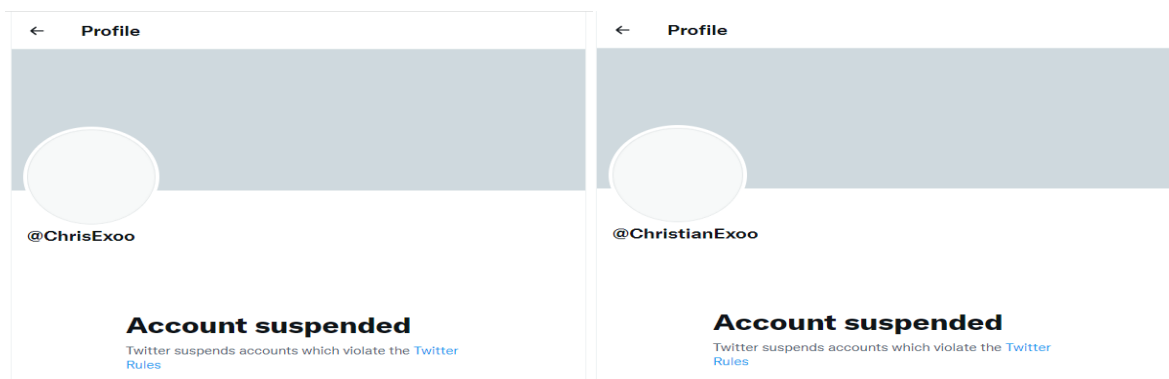
175. Exoo uses his employment and lecturing at St. Lawrence to recruit.

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<sup>21</sup> *Meet Vijaya Gadde, an Indian-born Twitter head who decides on blocking tweets, users*, The Economic Times, (Jan. 16, 2020) <https://economictimes.indiatimes.com/tech/internet/meet-vijaya-gadde-an-indian-born-twitter-head-who-decides-on-blocking-tweets/articleshow/73281445.cms>, (last accessed September 12, 2020). See also, *Twitter’s Top Lawyer Is Final Word On Blocking Tweets – Even Donald Trump’s*, Bloomberg.com, (Jan. 15, 2020) <https://www.bloomberg.com/news/articles/2020-01-15/twitter-s-gadde-is-final-word-on-blocking-tweets-even-trump-s>, last accessed September 12, 2020; *Meet Twitter’s top lawyer, who has the final word on blocking tweets – including Donald Trump’s*, Fortune.com, (Jan. 15, 2020) <https://fortune.com/2020/01/15/twitter-top-lawyer-vijaya-gadde-blocks-tweets-donald-trump/>, (last accessed September 12, 2020).



176. Exoo is and was well known to Gadde and Twitter as a ban evader before and during the time of Plaintiffs' dox.



177. Upon information and belief Gadde and Twitter Support have received complaints regarding @AntiFashGordon's doxing and social coordination, examples below.

#### An update on your report

Thanks again for letting us know. Our investigation found this account violated the [Twitter Rules](#):



**AntiFash Gordon**  
@AntiFashGordon

Violating our rules against [posting private information](#).

We appreciate your help in improving everyone's experience on Twitter. You can learn more about reporting abusive behavior [here](#).

#### An update on your report

Thanks again for letting us know. Our investigation found this account violated the [Twitter Rules](#):



**AntiFash Gordon**  
@AntiFashGordon

We appreciate your help in improving everyone's experience on Twitter. You can learn more about reporting abusive behavior [here](#).

#### An update on your report

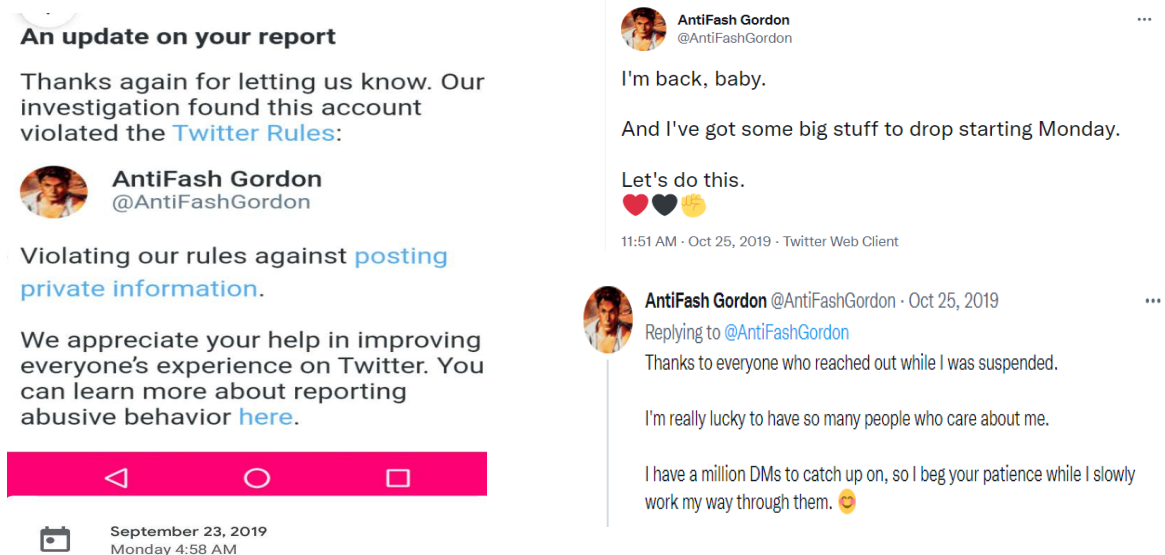
Thanks again for letting us know. Our investigation found this account violated the [Twitter Rules](#):



**AntiFash Gordon**  
@AntiFashGordon

We appreciate your help in improving everyone's experience on Twitter. You can learn more about reporting abusive behavior [here](#).

178. In or about September 2019, Exoo was suspended for posting confidential information of others, otherwise known as doxing, but reinstated weeks later.



179. Twitter has complete control over who is allowed an account, and as a permanently banned user Exoo could not possess an account without Twitter's consent or agreement when he was allowed to change his ban evasion account username from @DoxSavage to @AntiFashGordon.<sup>22</sup>



180. Exoo is connected to Twitter through his association with the account holder of @emilygorcenski, who has leveraged a connection to Jack Dorsey to have accounts that use “deadnames” banned, as seen in the image below.

<sup>22</sup> Video recording of Twitter executives confirming permanent Twitter bans are lifetime bans submitted to the Court on a thumb drive.



181. Gadde and Twitter have classified alleged white supremacists as a greater threat than drug cartels or Islamic terrorists, and Exoo and associates doxing benefits her publicly stated opposition to white supremacists, which she is “very, very focused on that...the KKK, the American Nazi Party,” because that “was what my parents had to deal with” where she grew up on the Texas-Louisiana border.<sup>23</sup>

182. Exoo and associates conduct activities that affects interstate commerce by threatening violence to persons and property and causing actual violence to persons and property.

183. Defendants directed and participated in patterns of racketeering activity, including multiple acts indictable under 18 U.S.C. §§ 1951 (Interference with commerce by threats or violence) and 1952 (use of interstate facilities to conduct unlawful activity), including using

<sup>23</sup> *Twitter's Kayvon Beykpour and Vijaya Gadde: the Code Conference interview (transcript)*, Vox.com (June 27, 2019) <https://www.vox.com/recode/2019/6/27/18760444/twitter-kayvon-beykpour-vijaya-gadde-kara-swisher-peter-kafka-code-conference-interview-transcript>, last accessed September 12, 2020.

interstate communications to order violent acts against all plaintiffs, specifically, D'Ambly, Rehl, Wolkind, and Scott.

184. The conduct of the Exoo and associates described above constitutes “racketeering activity” within the meaning of 18 U.S.C. § 1961(1). Defendants’ decisions and activity routinely conduct its transactions in such a manner constitutes “patterns of racketeering activity” within the meaning of 18 U.S.C. § 1961(5).

185. By virtue of these violations of 18 U.S.C. § 1962(c), Defendants are liable to Plaintiffs for three times the damages sustained, plus the costs of this suit, including reasonable attorneys’ fees.

186. As a direct and proximate result of Defendants patterns of racketeering activity Plaintiffs have suffered adverse consequences and continue to suffer adverse consequences in an amount to be determined at trial, but which is in excess of \$75,000.00. Plaintiffs are entitled to compensatory damages, equitable and declaratory relief, punitive damages, costs, and reasonable attorneys’ fees in an amount to be determined at trial, but which is in excess of \$75,000.00.

### **COUNT V**

#### **Violation of 18 U.S.C. § 1962(d) (Conspiracy) (as to all Plaintiffs against defendants Christian Exoo a/k/a “AntiFashGordon,” St. Lawrence University, Vijaya Gadde, and Twitter, Inc., the “Exoo Enterprise”)**

187. Plaintiffs reallege and incorporates herein by reference each and every one of the allegations contained in paragraphs 1 through 186 with the same force and effect as if set forth in detail herein again.

188. Section 1962(d) of RICO provides “shall be unlawful for any person to conspire to violate any provisions of subsection (a), (b), or (c) of this section.”

189. Defendants have violated 18 U.S.C. § 1962(d) by conspiring to associate and participate in the Exoo Enterprise's patterns of racketeering activities as defined in 18 U.S.C. 1962(c).

190. Defendants' have engaged in overt and predicate racketeering acts in furtherance of the conspiracy, including using interstate communications to threaten, intimidate and commit violent acts against their targets.

191. The nature of the above-described acts of Defendants in furtherance of the conspiracy gives rise to an inference that they not only agreed to the objective of an 18 U.S.C. 1962(d) violation, but they were aware that their ongoing acts have been, and are part of an overall pattern through related and continuous acts.

192. Defendants sought to and have engaged in the commission of, and continue to commit overt acts, including the following unlawful racketeering predicate acts:

- a. Multiple instances of interference with commerce by threats of violence in violation of 18 U.S.C. § 1951; and
- b. Multiple instances of use of interstate facilities to conduct unlawful activity violations of 18 U.S.C. § 1952.

193. As a direct and proximate result of Defendants' multiple overt acts and predicate acts in furtherance of an enterprise in violation of 18 U.S.C. § 1962(d), by conspiring to violate 18 U.S.C. 1962(c), D'Ambly has been and continues to be injured by Defendants' conduct.

194. By virtue of these violations of 18 U.S.C. § 1962(d), Defendants are liable to D'Ambly for three times the damages sustained, plus the costs of this suit, including reasonable attorneys' fees.

195. As a direct and proximate result of Defendants patterns of racketeering activity Plaintiffs have suffered adverse consequences and continue to suffer adverse consequences in an amount to be determined at trial, but which is in excess of \$75,000.00. Plaintiffs are entitled to compensatory damages, equitable and declaratory relief, punitive damages, costs, and reasonable attorneys' fees in an amount to be determined at trial, but which is in excess of \$75,000.00.

**COUNT VI**  
**Legal Malpractice**

**(as to D'Ambly against defendant Cohen, Weiss, and Simon, L.L.P.)**

196. D'Ambly repeats and incorporates herein by reference each and every one of the allegations contained in paragraphs 1 through 195 with the same force and effect as if set forth in detail herein again.

197. As a result of their personal revulsion of D'Ambly and his political beliefs CWS failed to adequately represent and protect D'Ambly's rights.

198. Defendant CWS neglected to perform necessary case research, legal research, and investigation of the accusations against D'Ambly.

199. As a result of CWS's inadequate legal research and investigation they failed to protect D'Ambly from the extortionate and criminal conduct of others.

200. As a result of CWS's failure to adequately investigate D'Ambly's doxing they failed to learn that @AntiFashGordon publicly announced D'Ambly's termination on January 13, 2019, which occurred five days before his official termination date, and one day before the purported "cause" of his termination was discovered.

201. CWS failed to challenge Brill's blatant misrepresentations regarding the timing of the alleged 'cause' of D'Ambly's termination.

202. CWS's revulsion of D'Ambly and his political beliefs caused them to ignore an obvious racially discriminatory pre-textual termination spotlighted by the private investigation, last and final warning, and falsely claimed cause of D'Ambly's termination.

203. As a direct and proximate result of CWS's legal malpractice that flowed from their firmwide enmity of D'Ambly's political beliefs D'Ambly has suffered adverse consequences and continues to be damaged. D'Ambly is entitled to compensatory damages, equitable and declaratory relief, punitive damages, costs, and reasonable attorneys' fees in an amount to be determined at trial, but which is in excess of \$75,000.00.

### **COUNT VII**

#### **Deprivation of Rights under *Section 610* of the Labor-Management Relationship Disclosure Act (LMRDA), 18 U.S.C. § 530**

**(as to D'Ambly against defendants Christian Exoo a/k/a "AntiFashGordon," St. Lawrence University, Vijaya Gadde, Twitter, Inc., "Exoo Enterprise")**

204. D'Ambly repeats and incorporates herein by reference each and every one of the allegations contained in paragraphs 1 through 203 with the same force and effect as if set forth in detail herein.

205. Under *Section 610* of the *Labor-Management Relationship Disclosure Act* ("*LMRDA*"), 18 U.S.C. §530:

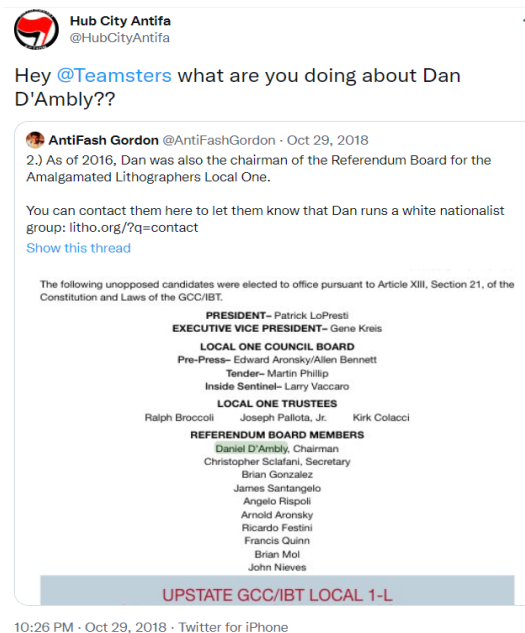
It shall be unlawful for any person through the use of force or violence, or threat of the use of force or violence, to restrain, coerce, or intimidate, or attempt to restrain, coerce, or intimidate any member of a labor organization for the purpose of interfering with or preventing the exercise of any right to which he is entitled under the provisions of this Act [LMRDA].

206. As a result of the acts described herein, D'Ambly was forced into early unexpected retirement. He was a printing press platemaker, and his union does not have a Union

Hall where he can go shape to obtain new union printing jobs, moreover, his trade has been significantly depressed by technology.

207. D'Ambly's job has deprived him of his intangible property rights as a union member, and the economic benefits that flow therefrom, for the reason that his job loss has had the impact of an expulsion from the Teamsters.

208. On or about October 29, 2018, Exoo and associates dogpiled Daily News and the Teamsters intending to prevent D'Ambly from exercising his rights provided by the LMRDA.



209. Exoo and associates, such as those who caused property damage at D'Ambly's home, intentionally intimidated others with threats, such the phrase any "blood spilled" to deprive D'Ambly his union member rights.



210. On January 13, 2019, when Exoo announced D'Ambly's termination the Teamsters were the only party capable of telling Exoo that D'Ambly was terminated, because the Daily News did not learn of the cause of D'Ambly's termination until January 14, 2019.

211. As a direct and proximate result of Exoo and associates' dogpiling that threatened violence, use of force, and "any blood spilled" D'Ambly has been deprived of his intangible property rights provided to him under the LMRDA. D'Ambly has suffered adverse consequences and continues to be damaged. D'Ambly is entitled to compensatory damages, equitable and declaratory relief, punitive damages, costs, and reasonable attorneys' fees in an amount to be determined at trial, but which is in excess of \$75,000.00.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs pray for relief as follows:

1. Demands judgment against Defendants, jointly and severally, in an amount to be determined at trial plus interest, including, but not limited to, all emotional distress, back pay,

punitive damages, liquidated damages, statutory damages, attorneys' fees, costs, and disbursements, and for such relief as the Court deems just and proper.

2. On Plaintiffs' RICO claims: compensatory damages and enhancement of damages Plaintiffs have sustained as a result of Defendants' conduct as may be permitted under the relevant statutes, such amount to be determined at trial, plus Plaintiffs costs in this suit, including reasonable attorneys' fees.

3. On Plaintiffs' tortious interference, intrusion upon seclusion, stalking and harassment claims: compensatory and punitive damages in an amount to be determined at trial.

4. On D'Ambly's State claims against the Tribune and Daily News: compensatory damages and enhancement of damages he sustained as a result of the Tribune and Daily News' conduct as may be permitted under the relevant statutes, such amount to be determined at trial, plus Plaintiffs costs in this suit, including reasonable attorneys' fees.

5. On D'Ambly's legal malpractice claim: compensatory damages to be determined at trial.

### **JURY DEMAND**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiffs demand trial by jury on all issues so triable.

Respectfully Submitted,  
**LAW OFFICE OF PATRICK TRAINOR**  
*Attorney for Plaintiffs*



Dated: November 30, 2021

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